

SCANNED

NEAL DRAWAS  
KROLL ASSOCIATES, INC.  
(978) 443-1833  
(978) 443-1929

facsimile transmittal

To: Greg Root Fax: (508)792-7621  
From: Neal Drawas Date: 02/21/02  
Re: ATF-Davidson RTN 2-00111 Pages: 9  
CC:

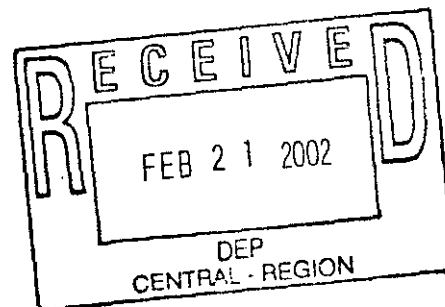
☐ Urgent ☒ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

In accordance with your request, attached is our initial comments to the Notice of Audit Findings and Notice of Non-compliance.

I would appreciate your contacting me as soon as possible to discuss this matter, and our request for a delay of the implementation schedule to allow time for the Department's review of the enclosed information and, if necessary, a meeting.

Please call me should you have any questions.

Neal Drawas



CONFIDENTIAL



900 Third Avenue  
New York, NY 10022-4751

Tel: (212) 593-1000  
Fax: (212) 593-2631

February 20, 2002

Mr. Greg Root  
Commonwealth of Massachusetts  
Department of Environmental Protection  
Central Regional Office  
627 Main Street  
Worcester, MA 01608

RE: CRWSC-Northbridge  
ATF-Davidson  
1 Main Street  
RTN 2-00111

Dear Mr. Root:

We have reviewed the Notice of Audit Findings and the Notice of Noncompliance issued on January 23, 2002. In completing our review, it is apparent that certain key documents and information included in the various documents previously submitted to the Department were excluded from the Department's review. Pursuant to our telephone conversation of February 13, 2002, it is our desire to meet with the Department to review the historical studies and technical information we believe adequately addressed the deficiencies cited by the Department. In preparation for such a meeting, I am providing herein, specific reference to that information.

On behalf of Arcade Realty Trust, I am also requesting that the Department delay of the implementation schedules as specified in the Notice of Audit Findings and Notice of Noncompliance. This is necessary to allow the Department time to review this information and for all parties to meet to discuss the Audit Findings.

The following responses correspond to the cited non-compliance items specified in the Department's Notice of Noncompliance Summary (NON-CE-01-3103) dated January 23, 2002.



**1. Failure to Meet Phase I Performance Standards, 310 CMR 40.0482**

*Submit*  
Illustrated site boundaries: The Phase I report included a Site Plan entitled "Monitoring Well Location Plan". This figure illustrated the property boundaries of the ATF-Davidson property, and monitoring wells. The Plan was taken from previous studies prepared by Caswell, Eichler and Hill that were on file with the

Department. We acknowledge that the figure did not specifically identify the area of impacted groundwater. A Phase I Addendum can be provided that specifically identifies the "Site".

*Submit* **Subsurface utilities:** There are no subsurface utilities within the Site, i.e. the groundwater impact area. The Phase I did not specify this fact. A Phase I Addendum can be provided that specifically states that no subsurface utilities exist within the Site.

*OKAY* **Legible denotations of monitoring wells-** A site plan was included in the Phase I entitled (Monitoring Well Location Plan). A Monitoring Well Plan was also included as Figure 1 in the Caswell, Eichler & Hill, "Additional M-8 Investigations" Report, dated March 1987 and provided as Appendix 4 of the Phase I Report. A Site Plan showing the locations of the monitoring wells was included as Figure 3 of the Response Action Outcome Statement dated December 1988. We are also aware that Roy F. Weston, Inc. prepared a Property Site Map (Figure 4) that also identifies the locations of the monitoring wells. If necessary, a Phase I Addendum can be provided that clearly identifies the location of all monitoring wells.

*ug/lg NB-1-B-5  
or ug/l?  
P. 8 states  
may have  
come from  
ATF!* **Sediment sampling locations-** Caswell, Eichler & Hill conducted two sediment studies in July 1985 and December 1985. Appendix E of the Caswell, Eichler & Hill, "Additional Investigations" Report, dated January 1986 contained a sample location plan. This report was included as Appendix 2 of the Phase I Report.

*NO SOIL SAMPLING FOR CHROMIUM*  
*Submit* **Floor and storm drain locations-** There are no floor or storm drains within the Site, i.e. the groundwater impact area. The Phase I did not specify this fact. A Phase I Addendum can be provided that specifically states that no floor or storm drains exist within the Site.

*0483  
(1)(b)(3)(e)  
(1)(c)(2)(a)* **General areas of Oil and Hazardous Material (OHM) Release-** Based on previous consultant reports; discussions with ATF-Davidson representatives; historical correspondence from DEQE; and our own site inspection, there were no identified areas of oil and hazardous material releases within the Site, or within the property. The Phase I did not specify this fact. A Phase I Addendum can be provided that specifically states that no Oil and Hazardous Materials Release areas were known to exist.

*MUST  
DISCUSS  
INABILITY TO  
GET H.M.  
DATA  
TELL HIM  
ITS OKAY* **Historical hazardous materials usage-** As stated in the Phase I Report the "Arcade" building was initially (1944) constructed by Whitin Machine Works as an equipment warehouse. Some time after 1966, ATF-Davidson used the building for the production of graphic arts equipment. The only processes known to occur were metal turning, milling, grinding, metal treatment, assembly, painting and testing. There was no indication from discussions with the ATF-Davidson representatives or documents on file with the Department that hazardous materials were used on-site. At the time the Phase I Report was prepared, ATF-Davidson had already vacated the property and there was no evidence of

historical hazardous materials usage. As stated in the report, the principal facilities for formerly manufacturing operations that utilized hazardous materials were located at the adjacent mill property. The Phase I report does cite the present of an electric transformer. It should be noted that the DEQE had been involved with ATF-Davidson since the early 1980's. This included the period when ATF-Davidson maintained operations at the Arcade property. It was our understanding that the only unresolved environmental matter in 1997 was groundwater contamination associated with RTN 2-0111.

List of permits and environmental compliance history- There were no local, state or federal environmental permits, or oil and/or hazardous material storage permits issued for the Site or property. The Phase I did not specify this fact. There were no records of non-compliance notices, citations or Consent Agreements for the Site or property. The Phase I did not specify this fact. However, the Phase I specifically cited historical studies pertaining to the compliance history of ATF-Davidson in response to DEQE's specific requests. A Phase I Addendum can be provided that specifically states that no environmental permits or citations were issued against the Site or property.

Estimation of the population within 0.5 miles of the Site- This information was provided in Section IVA of the Numerical Ranking System Scoresheet submitted to the Department on April 4, 1997. A Phase I Addendum can be provided that specifically states that the population within 0.5 miles of Site ranges from 100-999 individuals.

Number of institutions within 500 feet of the Site- This information was provided in Section IVA of the Numerical Ranking System Scoresheet submitted to the Department on April 4, 1997. A Phase I Addendum can be provided that specifically states that there are no institutions within 500 feet of the Site.

Names and addresses of all Potentially Responsible Parties- The name and address of the Person Undertaking Response Action was listed on the BWSC-108 Form submitted with the Phase I Report. The only other known owners of the property were ATF-Davidson and White Consolidated, Inc. which was stated in the Phase I. It is our understanding that 310CMR40.043 does not require the addresses of all potentially responsible parties, but states that a list may (emphasis added) be provided in the Phase I.

Mumford River sediment studies- The Phase I report includes two studies by Caswell, Eichler & Hill pertaining to chromium in the Mumford River sediments. The studies were reported in October 1985 (Phase I-Appendix 1) and January 1986 (Phase I-Appendix 2). The Phase I report specifically reported that ATF-Davidson and White Consolidated, Inc. stated that chromium was never used at the Arcade facility, and chromium was not a constituent of concern based on the on-site sampling and analysis. The January 1986 Caswell, Eichler & Hill report clearly demonstrated that the highest concentrations of chromium were located in

NRS Based  
ON PHASE I  
310CMR 40.0520

He SAID  
ITS AN  
OVERSIGHT

ANY SOIL DATA



No soil  
samples

sediment samples upstream of the Arcade property. Analytical results of groundwater samples collected from the Arcade monitoring wells reported non-detectable levels ( $<0.005$  mg/L) of chromium (Caswell, Eichler & Hill, October 1985; Phase I-Appendix 1).

Does NOT  
mean that  
no release  
occurred

no old data  
no soil data  
two out  
of three

Soil and groundwater analysis for heavy metals- Groundwater results for heavy metals were reported by Caswell, Eichler & Hill in their October 1985 Report. None of the reported laboratory results indicated an exceedence of GW-1 standards with the exception of barium. In January 1986, in response to the DEQE's request, Caswell, Eichler & Hill performed heavy metal analyses of arsenic, barium and zinc in soil. According to their findings, none of the results exceeded S-1 standards.

no reason  
to sample  
other metals

Information in the file indicates that electroplating rinsewaters may have been disposed at the Site- The Department has indicated that this allegation is based on a June 19, 1991 DEP report that was not in the Department's files at the time of our investigation. That 1991 report alleged that the Arcade property was filled with constituents consisting of 90% spent foundry sand, 5% coal ash, 5% paint, plating sludge, plating rinsewaters, bromide salt baths, solvents and cutting oils. The information source that allowed the author to make that quantitative statement is unknown to us. We also question the validity of that statement having reviewed the historic reports submitted by the previous owner/operator and their consultants, and having interviewed key facility personnel regarding this specific matter. ATF-Davidson has always represented that no hazardous substances were deposited in the fill area. In May 1984, ATF-Davidson certified to the USEPA that prior to 1965 all of processing and waste waters were discharged into the Mumford River from the adjacent mill property. From 1965 until 1984 all wastewater was treated at the adjacent mill property. From 1984, ATF-Davidson discontinued the use of the on-site treatment system and shipped all wastes off-site. Based on historical documents, former owner testimony and on-site site assessment data there is no information to support the statement that electroplating rinsewaters were disposed at the Site.

These are  
just  
statements

So now  
what?  
check  
1984  
HANDWRITTEN  
NOTES

Laboratory Analytical Reports and Chain of Custody- The documents were inadvertently left out of the Phase I report. They are available and can be provided in a Phase I Addendum report.

Approximate Limit of Contamination- Page 7 of the Phase I Report specifically identifies the location of contamination. The Phase I report states, "Analysis of groundwater samples indicated that VOC contamination was present only in monitoring wells M-3, M-6 and M-8. Analysis of samples from the other wells did not reveal VOC constituents. Analysis of the groundwater samples for priority pollutant metals; barium and cyanide revealed levels well below the Massachusetts Drinking Water Standards for all metals except barium. Barium was identified at concentrations near or slightly above that standard in monitoring wells M-4, M-5, M-6 and M-8."

submit

No, also in  
GP-6  
SB-2  
SB-5

6 & 8 are  
right at  
riverbank!

**310CMR 40.0482: Performance Standards**

A Phase I Report shall provide sufficient information to meet the requirements of the Numerical Ranking System and Tier Classification process described in 310CMR 40.0500 or where appropriate, support a Response Action Outcome Statement filed for a site prior to Tier Classification.

As previously stated, the Phase I report included either in the text portion or Appendices sufficient information. If necessary, a Phase I Addendum can be prepared that would clearly state any information that the Department believes is necessary to support the NRS and Tier Classification submitted to the Department in March 1997.

**Failure to Meet Response Action Outcome Performance Standards, 310CMR 40.1004**

The MCP requires the use of Method 2 or 3 if contamination is present in significant concentrations in media other than soil or groundwater.

This requirement does not pertain to this Site, as the chromium contamination found in the river sediments was not associated with the Arcade property activities. As previously stated, Caswell, Eichler & Hill demonstrated through their sampling and analysis of benthic samples and on-site groundwater monitoring, that chromium was present at greater concentrations upstream of the Site, and all groundwater samples from the on-site monitoring wells had non-detectable chromium concentrations. It was the conclusion of Caswell, Eichler & Hill, the DEQE and Kroll that the chromium present in the river sediments was not associated with the Arcade property. Therefore, the RAO Statement was in compliance with the Performance Standards.

No Exposure points were identified.

The only exposure points for the known groundwater contamination were the individual monitoring wells. Therefore, the RAO Statement was in compliance with the Performance Standards.

No exposure point concentrations were calculated.

This requirement does not pertain to this Site for the VOC contamination in groundwater. Therefore, the RAO Statement was in compliance with the Performance Standards.

The extent of the release was not indicated per 310CMR 40.0904

Submit  
OKAY

See 3/87  
Investigation  
conclusions  
M-9 was essentially  
clean in 1987  
but had  
52.9 ug/l PCB  
in 1997.  
PCB is higher  
than in 1986  
mon. wells  
should have  
been identified

why not?  
Submit

Did not determine  
GW on soil category  
Did not meet  
40.0971(4)

No assessment  
of risk to safety  
per 0971(5)

Q  
P. 10 identifies  
River as exp.  
point.

It is not clear what the cited deficiency refers to. As previously noted only three monitoring wells were found to have VOC and barium concentrations in excess of the applicable standards. All other wells within the Site were less than standard; therefore the extent of the release was inherently defined. Therefore, the RAO Statement was in compliance with the Performance Standards.

3 wells are scattered about the site & two are immediately Adj. to River.

There was no characterization of the OHM per 310CMR40.0904(3)

It is not clear what the cited deficiency refers to. The only known materials deposited in the fill area were coal ash and foundry sands. Both of which may have been the source of barium. As stated in the Phase I report and historical studies, the presence of VOC appeared to be from an unknown but localized source. Therefore, the RAO Statement was in compliance with the Performance Standards.

self-explanatory  
OKAY

The Phase I recommends continued groundwater sampling for two to three years to ensure continued reduction of contaminant concentrations levels, however, no full round of groundwater samples were collected subsequently.

Groundwater samples were collected from all impacted wells in January 1997, May 1998, and August 1998. The purpose for recommending continuing groundwater monitoring was to support the fact that the VOC concentrations were decreasing over time due to natural attenuation. By continuing to monitor groundwater, we had sufficient data to support a Response Action Outcome Statement. Groundwater monitoring was only required until such time as the applicable standards were achieved. At that time, further monitoring was not required, and the RAO Statement was filed. Therefore, the RAO Statement was in compliance with the Performance Standards.

\*  
only 6+8 were sampled  
5/98  
VCL continues to rise in every round in M-8

#### **Failure to Meet Public Notice Requirements, 310CMR40.0485**

No notice to Public officials regarding the availability of the Phase I and Tier Classification was found in files available to the Department

The Phase I Report, Tier Classification and Numerical Ranking System Scoresheet were submitted to the Department in March and April 1997. Included in the submittals were:

- 1- Notice of an Environmental Response Action giving notice of a Phase I Initial Site Investigation Report Availability with copies submitted to the Chief Municipal Officer and Board of Health of the Town of Northbridge.
- 2- Notice of an Initial Site Investigation and Tier II Classification with transmittal request for publication to the Milford Daily News, Classified Ad. Dept.

If necessary, we would be please to provide the Department addition copies of the required notices that were filed with the appropriate authorities and local newspaper for publication.

OKAY BUT  
NEXT TIME  
SEND IN COVER  
LETTER TO  
OFFICIALS  
OKAY, BUT NEXT  
TIME, SEND IN  
REAL COPY  
OF NEWSPAPER  
6 LISTING

Town clerk  
234-2001

Clipping from the newspaper or invoice as verification within seven (7) days of publication per 310CMR40.1403(6)(b).

The cited regulation does not specify that a clipping from the newspaper or an invoice is required. 310CMR40.1403(6)(b) states:

*At least three days prior to publication of the legal notice, a copy of the notice shall be sent to the Chief Municipal Officer and the Board of Health in the community (ies) in which the disposal site is located and in any other communities which are, or are likely to be, affected by the disposal site. If the Department does not publish the legal notice, then a copy of the legal notice which includes the date of publication and the name of the newspaper and a copy of the cover letter to the Chief Municipal Officer and Board of Health, shall be submitted to the Department within seven days of publication of the legal notice.*

DIDNT DO THIS

As previously stated, a copy of the legal notice was sent to the Municipal Officer and Board of Health and was provided with the Phase I and Tier Classification. A copy of the legal notice was sent to the Milford Daily News was also provided to the Department. As we normally send a copy of the notice to the Municipal Officer and Board of Health without a cover letter, a cover letter was not provided with the various filings to the Department. *well, the MCP says you must*

check CITATIONS

No copy of the notice to public officials regarding the availability of the RAO was found in the Department's files per 310CMR40.1403(f) and 40.1404(4).

A copy of the notice of the Response Action Outcome (RAO) Statement Availability to the Chief Municipal Officer and Board of Health was included as Appendix B of the RAO Statement filed with the Department.

Please note that we have not been able to locate the cited regulation 310CMR40.1403(f), and therefore can not respond to the allegation of non-compliance. 310CMR40.1404(4) does not apply to this Site as a Public Involvement Plan Site Designation does not apply to this Site.

1403(3)(F)! correct

**Violation of 310cmr 40.0620(3)(a) and 40.0620(6) (Class II) Submittal of LSP evaluation Opinion and Tier Classification by Transition Deadline**

The Transition Deadline for the site was August 2, 1995. A Tier Classification and an LSP Evaluation Opinion were submitted on March 12 and April 7, 1997, respectively.

Although the Department has indicated that this violation does not require further action, it is appropriate for us to ensure that accuracy of the facts of this citation. At the time that Arcade Realty Trust acquired the property it was their

IT'S STILL A VIOLATION

understanding that all matters related to RTN 2-0111 were completed by ATF-Davidson in accordance with the MCP and DEP's requirements. This was supported by the fact that all correspondence from the Department was directed to ATF-Davidson. It was not until January 1997 with the issuance of a notice to publish a list of Tier I Site, that Arcade Realty Trust became aware of the situation. Immediately upon receipt of the Notice, Arcade Realty Trust retained Kroll to prepare the required filings that were subsequently submitted in March and April 1997.

As you can see, we do not agree with all of the allegations of non-compliance, and do not agree with the Department's requirement that the RAO Statement be retracted. It is our recommendation that the appropriate course of action is for the Department to meet with us to review the cited deficiencies and the information already submitted to the Department.

As previously requested, until we have had an opportunity to meet with the Department to review all issues, we respectfully request that the deadlines of action to be taken be reasonably extended.

Upon review of this information, should you have any questions and wish to schedule a meeting, please feel free to call me (978) 443-1833.

Thank you for your attention to this matter and our request.  
KROLL, INC.



Neal M. Drawas  
Managing Director

cc. Mary Gardner  
James Moody  
Leonard Jolles



Massachusetts Department of Environmental Protection  
Bureau of Waste Site Cleanup

BWSC-102A

Release Tracking Number

RELEASE LOG FORM ATTACHMENT

A. LOG/RELEASE LOCATION INFORMATION: (complete if using BWSC-102A and 102B or BWSC-102A only)

City/Town: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_ ☐ AM ☐ PM

Release Address: \_\_\_\_\_

Use of Attachment (check one): ☐ Amendment to Release Log Form ☐ Attachment Page(s): \_\_\_\_\_ of: \_\_\_\_\_

B. ORAL PLAN SUMMARY: (check all that apply)

- |  |   |
|--|---|
| <input type="checkbox"/> Removal of Contaminated Soils   | <input type="checkbox"/> Deployment of Absorbent or Containment Materials |
| <input type="checkbox"/> Re-use or Recycling   | <input type="checkbox"/> Temporary Covers or Caps                         |
| <input type="checkbox"/> On Site <input type="checkbox"/> Off Site Volume: _____ cubic yards   | <input type="checkbox"/> Bioremediation                                   |
| <input type="checkbox"/> Treat <input type="checkbox"/> On Site <input type="checkbox"/> Off Site Volume: _____ cubic yards                            | <input type="checkbox"/> Soil Vapor Extraction                            |
| Describe: _____  | <input type="checkbox"/> Structure Venting System                         |
| <input type="checkbox"/> Store <input type="checkbox"/> On Site <input type="checkbox"/> Off Site Volume: _____ cubic yards                            | <input type="checkbox"/> Product or NAPL Recovery                         |
| <input type="checkbox"/> Landfill <input type="checkbox"/> Cover <input type="checkbox"/> Disposal Volume: _____ cubic yards                           | <input type="checkbox"/> Groundwater Treatment Systems                    |
| <input type="checkbox"/> Removal of Drums, Tanks or Containers   | <input type="checkbox"/> Air Sparging                                     |
| Describe: _____  | <input type="checkbox"/> Temporary Water Supplies                         |
| <input type="checkbox"/> Removal of Other Contaminated Media   | <input type="checkbox"/> Temporary Evacuation or Relocation of Residents  |
| Specify Type and Volume: _____   | <input type="checkbox"/> Fencing and Sign Posting                         |
| <input type="checkbox"/> Other Response Actions Describe: _____  |   |
| <input type="checkbox"/> Check here if this Release or Threat of Release is a candidate for future presumptive approval of an IRA or RAM Written Plan. |   |

Check one of the following: ☐ Oral IRA Plan Approval ☐ Oral RAM Plan Approval ☐ Oral IRA Plan Modification Approval

Other Comments: \_\_\_\_\_

C. ADDITIONAL INVOLVED PERSON INFORMATION:

Check One: ☐ PRP ☐ PRP Local Contact ☐ Other Person Performing Response Action  
☐ Other Relationship Specify: \_\_\_\_\_

Name of Organization: \_\_\_\_\_

Name of Contact: \_\_\_\_\_ Title: \_\_\_\_\_

Street: \_\_\_\_\_ ☐ Check here if this person received a field NOR.

City/Town: \_\_\_\_\_ State: \_\_\_\_\_ ZIP Code: \_\_\_\_\_

Telephone: \_\_\_\_\_ Ext.: \_\_\_\_\_ FAX: \_\_\_\_\_

D. DEP ASSIGNMENT: (complete if using only BWSC-102A)

Preparer of RLFA (please print): \_\_\_\_\_ Signature: \_\_\_\_\_

Staff Lead Assigned (if different from preparer): \_\_\_\_\_

- ☐ Check here if the Release or Threat of Release is unassigned.  
☐ Check here if this RLFA records a change in staff lead.



Massachusetts Department of Environmental Protection  
Bureau of Waste Site Cleanup

BWSC-102B

RELEASE LOG FORM ATTACHMENT

Release Tracking Number

2-0111

E. LOG/RELEASE LOCATION INFORMATION: (complete if using BWSC-102B only)

City/Town: Northbridge Date: 12/14/01 Time: 8:00 ☒ AM ☐ PM

Release Address: 1 Main St.

Use of Attachment (check one): ☐ Amendment to Release Log Form ☒ Attachment Page(s): 1 of: 1

F. INSPECTIONS OR SITE VISITS (also Follow-up Office Response): (check one)

- ☐ Initial Compliance Field Response - Announced ☐ Initial Compliance Field Response - Unannounced  
☒ Compliance Field Response - Announced ☐ Compliance Field Response - Unannounced ☐ Short Notice Audit Inspection  
☐ Field Response - Direct Oversight ☐ Follow-up or Other Field Response ☐ Follow-up Office Response

G. ADDITIONAL DESCRIPTION:

Audit Site Inspection. I met Neal Drawas (LSP) on-site to review site conditions. We observed the locations of monitoring wells, surficial soil conditions, and riverbank conditions.

Site is mainly coal ash fill. cinders + ash cover almost the whole site. Growth is sparse but not stressed.

Photos collected - see file memo

H. DEP ASSIGNMENT: (complete if using BWSC-102A and 102B or BWSC-102B only)

Preparer of RLFA (please print): Greg Root Signature: Greg Root

Staff Lead Assigned (if different from preparer):

- ☒ Check here if the Release or Threat of Release is unassigned.  
☐ Check here if this RLFA records a change in staff lead.

# KROLL ASSOCIATES, INC.

2 PENN PLAZA EAST, NEWARK, NJ 07105

TELEPHONE: (973) 589-7666

FAX: (973) 522-1338

July 6, 1998

Massachusetts Department of Environmental Protection  
Central Regional Office  
627 Main Street  
Worcester, MA 01608

RE: ATF-Davidson Property  
355 Main Street, (Whitinsville) MA  
RTN 2-0111 *Northbridge*

Dear Sir/Madam:

This status report is being provided by Kroll Associates, Inc. on behalf of Arcade Realty Trust, the current owner of the subject property. A Phase I Initial Site Investigation Report, Licensed Site Professional Evaluation Opinion and a Tier II Classification Numerical ranking Scoresheet were submitted to the MADEP in March 1997. It appeared that natural attenuation would reduce residual chlorinated constituent concentrations to within MCP Method 1 Cleanup Standards in a relatively short time period.

As described in the Phase I Report, annual groundwater sampling and analysis is being conducted to monitor conditions at the Site. Groundwater samples were collected on May 28, 1998. Vinyl Chloride (VCL), that exceed the MCP Method 1 GW2/GW3 Cleanup Standard in two monitoring wells on October 17, 1996, was the only contaminant of concern for this sampling period. The two monitoring wells that were re-sampled, as result of historical exceedances, were M-6 and M-8. For convenience a summary table with previous laboratory results and a Site Plan showing monitoring well locations are enclosed.

The results of the VOC analysis by EPA Method 8260 are tabulated below, with

<u>Compound</u>	<u>M-6</u>		<u>M-8</u>		<u>GW2/3 Standard</u>
	10/96	05/98	10/96	05/98	
Tetrachloroethene (PCE)	93.3	5	ND	ND	3,000
Trichloroethene (TCE)	31.4	ND	5.1	2	300
1,2-Dichloroethene (DCE)	28.2	ND	82.1	64	20,000
Vinyl Chloride (VCL)	17.8	ND	62.5	72	2
Methyl-t-butyl ether (MTBE)	ND	1	ND	ND	50,000



the more restrictive of the GW-2 or GW-3 Cleanup Standards and the October 17, 1996 results also show for comparison. JUL 1998

As indicated above, VCL has dropped to a non-detectable level in M-6, but the concentration has risen slightly in M-8. VCL in M-8 is now the only constituent exceeding the GW-2 Cleanup Standard of 2 ug/L. the GW-2 Groundwater Category has been chosen as being the most appropriate due to the proximity of some of the monitoring wells to the building on site. The MCP characterizes groundwater as GW-3 if it is located beyond 30 feet of an occupied building or structure [310 CMR 40.0932(6)]. Therefore, groundwater in the area of M-8 may be assessed using only the GW-3 Standard of 500 ug/L for VCL due to its location (see attached Site Plan). The M-8 result of 72 ug/L readily meets this limit.

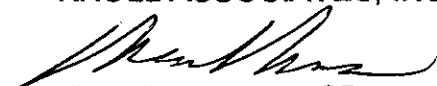
Although it is not clear why the major constituent reduction seen in M-6 has not also occurred in M-8, it is possible that the construction of a building addition immediately upgradient of M-6 has helped to mitigate that source. A passive venting that was installed under the slab to eliminate potential vapor migration into the building and the elimination of stormwater percolation all may have contributed to the contaminant reduction in groundwater.

Our understanding of the biodegradation of PCE and TCE is that high levels of DCE and VCL are positive indicators of bacterial activity. It is anticipated that natural bioremedial action will ultimately be completely adequate in degrading these compounds.

Due to the encouraging results presented here, a subsequent sampling round will be conducted in August 1998. Pending the analytical results, it is anticipated that a Class B-1 Response Action Outcome Statement will be submitted for the release, demonstrating that a permanent solution has been achieved with a level of No Significant Risk to health, safety, public welfare and the environment.

Please contact this office if you have any questions regarding these finding or need further information.

Very truly yours,  
KROLL ASSOCIATES, INC.

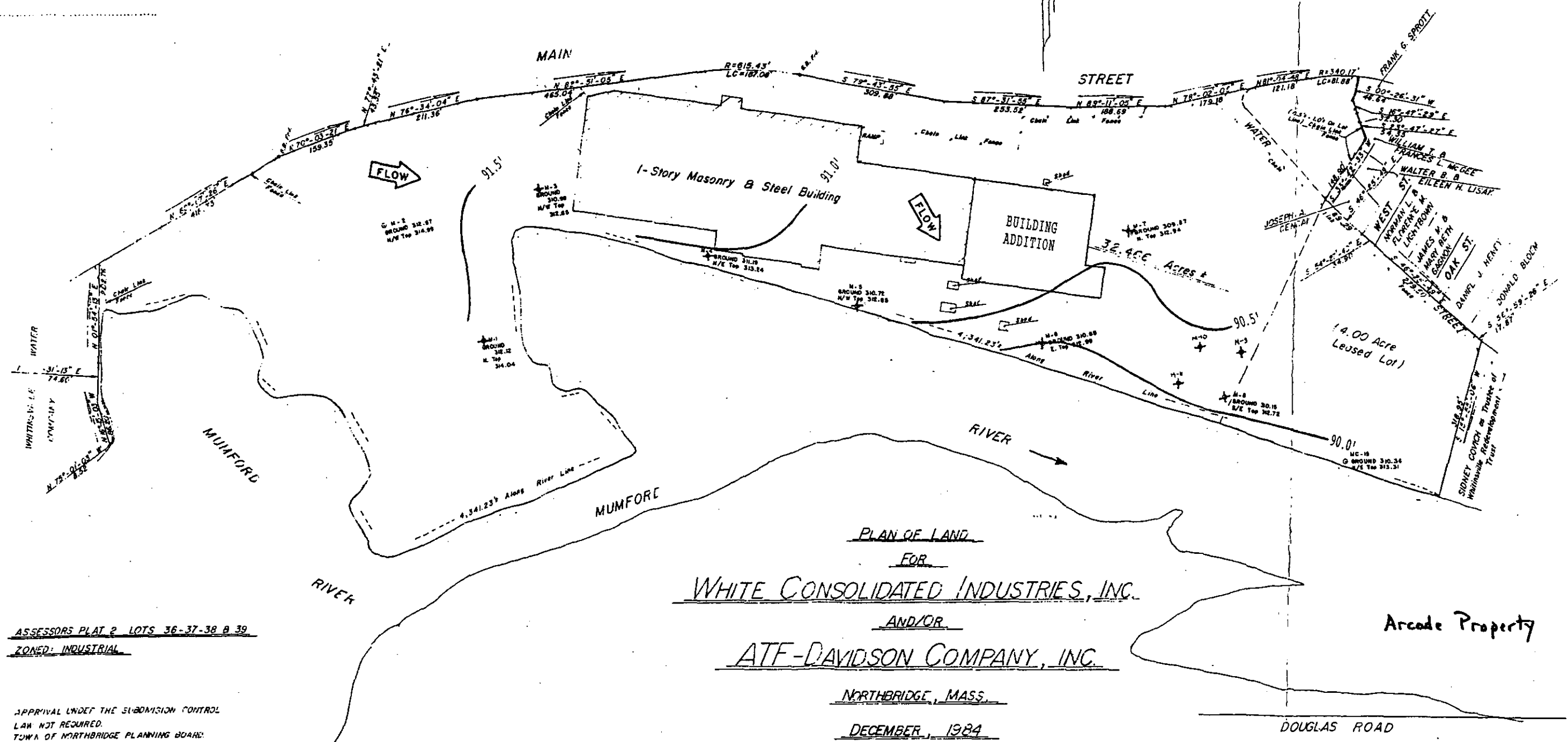
  
Neal M. Drawas, LSP

Encl.

JUL 7 1998

FOR REGISTRY USE ONLY

I CERTIFY THAT I HAVE  
CONFORMED WITH THE RULES AND  
REGULATIONS OF THE REGISTERS OF  
DEEDS IN PREPARING THIS PLAN.



**B** BIBEALT AND FLORENTZ **F**  
ENGINEERING CO.  
CIVIL ENGINEERS AND LAND SURVEYORS  
99 MAIN STREET, WOONSOCKET, R.I.



Commonwealth of Massachusetts  
Executive Office of Environmental Affairs

## Department of Environmental Protection

William F. Weld  
Governor  
Trudy Coxo  
Secretary, EOE  
David B. Struhs  
Commissioner

2-0000111-  
ATF Davidson  
1 Main Street  
Northridge

June 30, 1995

RE: Deadline For an Evaluation of a  
Non-priority Disposal Site.

Dear Sir or Madam:

Our information indicates that you may have a connection to the above referenced location as a landowner, facility owner or operator, generator or transporter of oil or hazardous material, or another type of connection to oil or hazardous material released at such location. The Department of Environmental Protection (DEP) listed the location identified above as a **Non-priority Disposal Site** at which releases of oil and/or hazardous material occurred prior to January 1989. The Massachusetts Contingency Plan (310 CMR 40.0000, the "MCP") and Chapter 21E (the "State Superfund") of the Massachusetts General Laws contain specific requirements that must be met by those legally responsible for Non-priority Disposal Sites.

In summary, the MCP requires this site to be evaluated to determine whether a reportable release of oil and/or hazardous material has occurred and whether further response actions are required. If you take appropriate action before August 2, 1995, you can minimize your cleanup costs, maintain compliance with the MCP, and avoid possible DEP enforcement action.

**PLEASE BE ADVISED** that, if you have not already done so, you must submit a Licensed Site Professional (LSP) Evaluation Opinion by August 2, 1995, that provides a determination that either:

- 1) there has not been a reportable release and no response actions are necessary; OR
- 2) a reportable release has occurred but previous response actions were sufficient to satisfy the cleanup requirements of the new MCP and no further response actions are necessary; OR
- 3) a reportable release has occurred and additional response actions are necessary. (If additional actions are necessary due to groundwater contamination in an aquifer.

The specific requirements that must be met for Non-priority Disposal Sites can be found in the MCP at 310 CMR 40.0636.

that can potentially be used for drinking water, you may apply for a one year extension of the August 2, 1995 deadline. See Attachment A for further information). <sup>PPA definition change</sup>

If you previously filed a report with DEP which specifically recommended that no further actions are necessary at this site, you may submit a certified statement that affirms that recommendation in lieu of submitting an LSP Evaluation Opinion.

If you file an LSP Evaluation Opinion or affirm a no further action recommendation by August 2, 1995, DEP will not assess an Annual Compliance Fee for the first year. If you fail to do so, the site will be categorically classified as a Tier IB Disposal Site and you will be assessed a Tier IB Annual Compliance Fee of \$2,600 per year until you reclassify<sup>2</sup> the site or submit a RAO to the Department.

If you believe filing an LSP Evaluation Opinion is beyond your financial, legal or technical ability you must notify DEP of your inability to file by following the procedures of 310 CMR 40.0172.

Licensed Site Professional (LSP):

You must employ a Licensed Site Professional (LSP) to file an LSP Evaluation Opinion. LSPs are professionals licensed by the Commonwealth of Massachusetts to issue Waste Site Cleanup Activity Opinions in connection with response actions at sites. For a list of LSP names, please contact the Board of Registration at (617) 556-1145.

You and your Licensed Site Professional (LSP) may obtain copies of all DEP forms and applications by contacting your DEP regional service center.

If you believe you never had or no longer have a connection to this site which makes you responsible for cleanup, please send a written explanation to my attention along with any information you have regarding those currently connected with this site. If you have other questions, please call the MCP Hotline at (617) 338-2255 from the 617 area code and outside Massachusetts or to (800) 462-0444 from the 413 and 508 area codes.

Very truly yours,



Stephen P. Winslow  
Bureau of Waste Site Cleanup

---

<sup>2</sup>As an alternative to tier classification, persons who own property to which groundwater contamination has migrated may be able to file for Downgradient Property Status as described in 310 CMR 40.0180).

GR



COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
Central Regional Office, 627 Main Street, Worcester, MA 01608

MITT ROMNEY  
Governor

ELLEN ROY HERZFELDER  
Secretary

KERRY HEALEY  
Lieutenant Governor

ROBERT W. GOLLEDGE, Jr.  
Commissioner

The Shop at Whitinsville  
One Main Street  
Whitinsville, MA 01588

Re: CRWSC - Northbridge  
Covitch Property  
One Main Street  
RTN 2-0000112

Attention: Leonard Jolles  
Property Manager

Notice of Response Action  
Deadline Extension Approval  
310 CMR 40.0000  
M.G.L. c. 21E

Dear Mr. Jolles:

The Department has reviewed and approves the Request for Additional Schedule Extension, dated June 7, 2004, and submitted on your behalf by Alistair McDonald, LSP, of Golder Associates, Inc. The Department approves the deadline extension to **August 19, 2004**, for complying with the requirements of the Notice of Response Action (NORA), dated February 6, 2004.

If you have any questions regarding this deadline extension approval, please contact me at (508) 767-2803.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mark E. Baldi", written over a horizontal line.

Mark E. Baldi  
Acting Section Chief  
Audits/Site Management  
Bureau of Waste Site Cleanup

Date: June 14, 2004

cc: Alistair R.T. MacDonald, LSP, Golder Associates, 540 North Commercial St.,  
Manchester, NH 03101-1146  
James Moody, Enforcement Tracking, BWSC, DEP-CERO  
Greg Root, Audits, BWSC, DEP-CERO  
Maria Pinaud, Office of Enforcement, DEP-Boston  
Gregg Hunt, BWSC, DEP-Boston  
File: Data Entry [ C&E/DMDOAP ]

U.S. Postal Service

# CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

01588 MA 01588

Postage

\$

Certified Fee

Return Receipt Fee  
(Endorsement Required)

Restricted Delivery Fee  
(Endorsement Required)

Total Postage & Fees

\$

Postmark  
Here

Sent To

THE SHOP AT WHITINSVILLE

Street, Apt. No.; or PO Box No.

ONE MAIN STREET

City, State, ZIP+4

WHITINSVILLE, MA 01588

01588 MA 01588



COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS  
**DEPARTMENT OF ENVIRONMENTAL PROTECTION**  
Central Regional Office, 627 Main Street, Worcester, MA 01608

MITT ROMNEY  
Governor

KERRY HEALEY  
Lieutenant Governor

ELLEN ROY HERZFELDER  
Secretary

ROBERT W. GOLLEDGE, Jr.  
Commissioner

**URGENT LEGAL MATTER: PROMPT ACTION NECESSARY**

February 6, 2004

The Shop at Whitinsville  
One Main Street  
Whitinsville, MA 01588

RE: Northbridge- BWSC  
Shop Portion of Covitch Property  
RTN # 2-0000112  
**NOTICE OF RESPONSE ACTION**  
M.G.L. c.21E & 310 CMR 40.0000

**Because of a failure to act by those parties potentially responsible for contamination at the above location, the Department of Environmental Protection is planning to hire its own contractor(s) to begin performing needed work at this site. If such actions occur, the Department will seek to recover 3 times its costs against those parties considered legally liable for contamination at this site, and will do so by placing a lien on all properties in the Commonwealth owned by such parties. Actions must be taken NOW to prevent the Department from proceeding in this regard.**

Dear Mr. Jolles:

The Department of Environmental Protection, Bureau of Waste Site Cleanup (the "Department" or "DEP") has determined that there have been one or more releases of oil and/or hazardous material at the above-referenced site. The investigation and cleanup of such releases is governed by M.G.L. c. 21E, the Massachusetts Oil and Hazardous Materials Release Prevention and Response Action, and the regulations adopted thereunder, known as the Massachusetts Contingency Plan (the "MCP"; 310 CMR 40.0000).

On April 30, 1985 you (as used in this Notice "you" refers to The Shop at Whitinsville), notified the Department of releases of oil and hazardous materials associated with historical manufacturing site uses that resulted in impacts to soil, groundwater and a surface water threat. Release Tracking Number ("RTN") RTN # 2-0000112 was assigned and on April 30, 1985, a

Notice of Responsibility ("NOR") was issued to you. In addition, a Notice of Audit Finding/Notice of Noncompliance was issued on April 29, 2002; an Audit Follow-up Plan Conditional Approval requiring specific actions was issued on October 24, 2002. The NON informed you that you are not in compliance with M.G.L. c. 21E and the MCP because you failed to conduct certain Response Actions at the site in accordance with regulatory deadlines. As of the date of this letter, you have failed to comply with all of the Audit Follow-up Plan Conditional Approval conditions required at the site needed to address this release. As a result, if you are a legally liable party, you continue to be in noncompliance with M.G.L. c. 21E and the MCP and you are now subject to Civil Administrative Penalties under M.G.L. c. 21A, Section 16 and 310 CMR 5.00, the Civil Administrative Penalty Regulations.

This Notice provides you a final opportunity to take the Response Actions required to address this site before the Department does so. Unless you promptly reply to this Notice and comply with its requirements, the Department will prepare to take the actions described below on or after **March 5, 2004**. Massachusetts General Law Chapter 21E, Section 4 authorizes the Department to take such Response Actions and, when time allows, requires the Department to notify you of its intent to take such actions.

#### **RESPONSE ACTIONS REQUIRED AT THIS SITE**

To comply with the requirements of M.G.L. c.21E and the MCP, as specified in the Notice of Responsibility(ies) issued in this matter, all necessary actions must be taken to eliminate substantial hazards presented by the site and achieve a level of No Significant Risk [310 CMR 40.1000]. These actions may include, but are not limited to, Comprehensive Response Actions [310 CMR 40.0800] and/or any necessary Immediate Response Actions [310 CMR 40.0400].

#### **COMPLIANCE DEADLINE FOR NOTIFICATION OF YOUR INTENT TO CONDUCT RESPONSE ACTIONS**

**To perform Response Actions in lieu of the Department, you must respond to this Notice by *February 27, 2004* and provide the Department with the following:**

1. A signed agreement with a Licensed Site Professional (LSP) to conduct Response Actions as required by M.G.L. c.21E and the MCP. You may obtain a list of the names and addresses of these LSPs from the Board of Registration of Hazardous Waste Site Cleanup Professionals at (617) 556-1145 or online at <http://www.lspa.org>;
2. A strict timetable for conducting such Response Actions;

#### **RESPONSE ACTIONS THE DEPARTMENT INTENDS TO TAKE IF YOU FAIL TO ACT**

If you do not provide the commitment to conduct Response Actions as specified above, as an initial step in the site characterization process, the Department will secure the services of one or more of its contractors to conduct the following actions at this site:



1. Review of all pertinent records including the state, local, federal and historical records which are available for information relative to the use, storage, disposal and discharge of metal plating wastes at the site.
2. Collect at least five (5) sediment samples, two (2) of which will be located downstream of the plant, to be laboratory analyzed for 13 Priority Pollutant Metals.
3. Review the Phase II Comprehensive Site Assessment and Response Action Outcome Statement, submitted in accordance with the Audit Follow-up Plan, to determine if adequate sampling was conducted downgradient of the raceway to define the extent of contamination as per the Audit Follow-up Plan Conditional Approval. Additional soil and groundwater sampling may be conducted if warranted.

Information obtained from the above initial site investigation activities will help determine the scope, nature, and timing of additional actions. The Department reserves the right to conduct the additional response actions necessary to achieve a level of No Significant Risk at the site without providing additional notice to you.

#### **POTENTIAL LIABILITY AND TREBLE DAMAGES**

Please be advised that the Department continues to considers you potentially liable under M.G.L. c.21E for up to three (3) times the Department's Response Action Costs incurred by the Department and for damages from the impairment of the Commonwealth's natural resources. This liability was described in the Notice of Responsibility previously issued to you. In addition to liability for the Department's Response Action Costs, any person who violates any provision of M.G.L. c. 21E or 310 CMR 40.0000 shall be subject to a civil penalty not to exceed \$25,000 for each day of violation or by a fine of not more than \$25,000 or by imprisonment for not more than two years for each such violation.

To secure payment of Response Action Costs, the Commonwealth has the authority under M.G.L. c. 21E, §13 to effect liens on site and non-site property that you own in the Commonwealth. The Commonwealth may foreclose on any such lien, and the Attorney General may bring other legal action against you to recover any debt owed the Commonwealth.

If you wish to claim that you are financially unable to conduct the required Response Actions at this time, you must submit a notice of financial, technical or legal inability as described in 310 CMR 40.0172 to secure yourself with a defense to treble damages. If you can demonstrate that you do not have the financial resources available to continue the cleanup at your property, the Department can grant Financial Inability (FI) status, which must be renewed annually. In order to be granted FI status by the Department, you must complete and submit a FI application to DEP on or before **February 27, 2004**. Your application must include submittal of your three most recent Federal Income Tax returns, along with two cost estimates prepared by LSPs for the next required action to clean up your site. For more information regarding the financial inability application, please contact Wanda Kopczyk at (617) 348-4055. Even if you have a defense to treble damages, you will still be obligated to complete response actions that you are able to perform and continue to be liable for costs and damages.

Should DEP initiate Response Actions at this site, DEP reserves the right to exercise the full extent of its legal authority to obtain full compliance with all applicable requirements, including but not limited to, criminal prosecution, civil action including court-imposed civil penalties, and administrative penalties issued by DEP. If you have any questions relative to this Notice, please contact **James Moody** at the letterhead address or by telephone at **508-767-2703**. All future communications regarding this release should reference the following Release Tracking Number: RTN # 0000112.

Sincerely,



Mark E. Baldi  
Acting Section Chief  
Audits/Site Management  
Bureau of Waste Site Cleanup

**CERTIFIED MAIL # 7000 1670 0002 8600 5170**

cc:

Mary Gardner, Deputy Regional Director, BWSC, DEP-CERO  
Michael Maher, Regional Enforcement Coordinator, DEP-CERO  
Northbridge Board of Health  
DEP-BOSTON

Attn: Janine Commerford, BWSC Division Director of Technical and Financial Support  
Maria Pinaud, Compliance and Enforcement Chief  
Data Entry- [ C&E/NORA ]



**Massachusetts Department of Environmental Protection**  
**Bureau of Waste Site Cleanup**

BWSC-104

**RESPONSE ACTION OUTCOME (RAO) STATEMENT &  
 DOWNGRADE PROPERTY STATUS TRANSMITTAL FORM**

Pursuant to 310 CMR 40.0180 (Subpart B), 40.0580 (Subpart E) &amp; 40.1058 (Subpart J)

*nm 10/5/02* *AD*  
 Release Tracking Number

2 - 0111

**A. SITE OR DOWNGRADE PROPERTY LOCATION:**Site Name: (optional) ATF DavidsonStreet: 1 Main Street 355 Main StreetLocation Aid: OPPOS **RECEIVED**City/Town: Whitinsville (Northbridge)ZIP Code: 01588**OCT 31 2002**

☒ Check here if this Site location is Tier Classified. If a Tier I Permit has been issued, state the Permit Number:

Related Release Tracking Numbers that this Form Addresses: 2-11846**DEP - CERO**

If submitting an RAO Statement, you must document the location of the Site or the location and boundaries of the Disposal Site subject to this Statement. If submitting an RAO Statement for a PORTION of a Disposal Site, you must document the location and boundaries for both the portion subject to this submittal and, to the extent defined, the entire Disposal Site. If submitting a Downgrade Property Status Submittal, you must provide a site plan of the property subject to the submittal and, to the extent defined, the Disposal Site.

**B. THIS FORM IS BEING USED TO:** (check all that apply)

☒ Submit a Response Action Outcome (RAO) Statement (complete Sections A, B, C, D, E, F, H, I, J and L).

☒ Check here if this is a revised RAO Statement. Date of Prior Submittal: 12/18/98

☐ Check here if any Response Actions remain to be taken to address conditions associated with any of the Releases whose Release Tracking Numbers are listed above. This RAO Statement will record only an RAO-Partial Statement for those Release Tracking Numbers.

Specify Affected Release Tracking Numbers: \_\_\_\_\_

☐ Submit an optional Phase I Completion Statement supporting an RAO Statement or Downgrade Property Status Submittal (complete Sections A, B, H, I, J, and L).

☐ Submit a Downgrade Property Status Submittal (complete Sections A, B, G, H, I, J and K).

☐ Check here if this is a revised Downgrade Property Status Submittal. Date of Prior Submittal: \_\_\_\_\_

☐ Submit a Termination of a Downgrade Property Status Submittal (complete Sections A, B, I, J and L).

☐ Submit a Periodic Review Opinion evaluating the status of a Temporary Solution (complete Sections A, B, H, I, J and L).

Specify one: ☐ For a Class C RAO ☐ For a Waiver Completion Statement indicating a Temporary Solution

Provide Submittal Date of RAO Statement or Waiver Completion Statement: \_\_\_\_\_

You must attach all supporting documentation required for each use of form indicated, including copies of any Legal Notices and Notices to Public Officials required by 310 CMR 40.1400.

**C. DESCRIPTION OF RESPONSE ACTIONS:**

(check all that apply)

☒ Assessment and/or Monitoring Only

☐ Removal of Contaminated Soils

☐ Re-use, Recycling or Treatment

☐ On Site ☐ Off Site Est. Vol.: \_\_\_\_\_ cubic yards

Describe: \_\_\_\_\_

☐ Landfill ☐ Cover ☐ Disposal Est. Vol.: \_\_\_\_\_ cubic yards

☐ Removal of Drums, Tanks or Containers

Describe: \_\_\_\_\_

☐ Removal of Other Contaminated Media

Specify Type and Volume: \_\_\_\_\_

☐ Other Response Actions

Describe: \_\_\_\_\_

☐ Deployment of Absorbent or Containment Materials

☐ Temporary Covers or Caps

☐ Bioremediation

☐ Soil Vapor Extraction

☐ Structure Venting System

☐ Product or NAPL Recovery

☐ Groundwater Treatment Systems

☐ Air Sparging

☐ Temporary Water Supplies

☐ Temporary Evacuation or Relocation of Residents

☐ Fencing and Sign Posting

SECTION C IS CONTINUED ON THE NEXT PAGE.

**Massachusetts Department of Environmental Protection  
Bureau of Waste Site Cleanup****BWSC-111**

nyn: 11/5/02: Adm: Aud

**AUDIT FOLLOW-UP PLAN TRANSMITTAL FORM  
& POST-AUDIT COMPLETION STATEMENT**

Release Tracking Number

2 - 111

Pursuant to 310 CMR 40.1180 - 40.1170 (Subpart K)

**A. SITE LOCATION:**Site Name: (optional) ATF DavidsonStreet: ~~1 Main Street~~ 355 Main StreetLocation Aid: opposite Whittin PondCity/Town: Whitinsville (Northbridge)

ZIP Code: \_\_\_\_\_

Tier Classification Status: (check one) ☐ Not Tier Classified ☒ Tier 2 ☐ Tier 1 Permit Transmittal Number: \_\_\_\_\_Related Release Tracking Numbers that this form addresses: 2-11846**B. THIS FORM IS BEING USED TO:** (check one)

- ☐ Submit an Audit Follow-Up Plan (complete Sections A, B, D, E and F).
- ☐ Submit a Modified or Revised Audit Follow-Up Plan (complete Sections A, B, D, E and F).
- ☒ Submit a Post-Audit Completion Statement (complete Sections A, B, C, D, E, and F).

You must attach all supporting documentation for the use of form indicated, including copies of any Legal Notices and Notices to Public Officials required by 310 CMR 40.1400.

**C. POST-AUDIT RESPONSE ACTIONS SUMMARY:**Notice of Audit Finding: Date issued: 01/23/2002

Check all that apply:

☒ Documentation (Check all that apply):

- ☒ Provided Technical Justification, or Supporting or Clarifying Information Relating to Previous Response Actions
- ☐ Performed Additional Risk Assessment
- ☐ Modified Disposal Site Boundary

☐ Field Work (Check all that apply):☐ Sampled Previously Assessed Media (Check all that apply):☐ Soil ☐ GW ☐ SW ☐ Sediment ☐ Air ☐ Waste Material☐ Sampled New Media Not Previously Assessed (Check all that apply):☐ Soil ☐ GW ☐ SW ☐ Sediment ☐ Air ☐ Waste Material☐ Performed Remediation (Describe): \_\_\_\_\_☐ Outcomes (Check all that apply and submit appropriate transmittal form(s)):

- ☐ Implemented or Amended Activity and Use Limitation
- ☐ Modified Risk Assessment Method
- ☐ Revised Response Action Outcome (RAO) Class
- ☐ Revised Tier Classification
- ☐ Revised or Modified Phase Work
- ☐ Retracted RAO Statement
- ☐ Other: \_\_\_\_\_



**Kroll  
Associates**

*nym: file 11/19/02*  
900 Third Avenue  
New York, NY 10022-4751

Tel: (212) 593-1000  
Fax: (212) 593-2631

November 12, 2002

MADEP  
Div. Waste Site Cleanup  
Central Regional Office  
627 Main Street  
Worcester, MA 01609

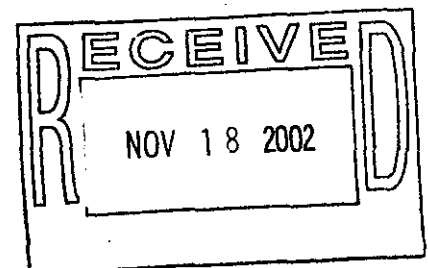
RE: Former ATF-Davidson Arcade  
Main Street  
Northbridge, MA  
RTN# 2-0111

Gentlemen/Ladies:

Enclosed please find Certified Mail Receipts from the Northbridge (Whitinsville)  
Selectmen's Office and Board of Health verifying their receipt of the Notice of an  
Environmental Response Action issued by Corey Management Company, Inc.  
(see Attachment).

Very truly yours,

  
Neal M. Drawas



**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

BOARD OF HEALTH  
TOWN HALL  
MEMORIAL SQUARE  
WHITINSVILLE, MA 01588

2. Article Number

(Transfer from service label)

7002 0

PS Form 3811, August 2001

Domestic Return Receipt

U.S. Postal Service  
**CERTIFIED MAIL RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

WHITINSVILLE MA 01588  
UNIT ID: 0730

Postage

\$ 0.37

Certified Fee

2.30

Return Receipt Fee  
(Endorsement Required)

1.75

Restricted Delivery Fee  
(Endorsement Required)

4.42

Total Postage & Fees

\$ 4.42

Postmark  
Here  
Clerk: KMGXB1

11/04/02

Sent To BOARD OF HEALTH

Street, Apt. No.,  
or PO Box No.

TOWN HALL  
MEMORIAL SQUARE

City, State, ZIP+4

WHITINSVILLE, MA 01588

PS Form 3800, April 2002 See Reverse for Instructions

7002 0860 0008 4092 1634

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

SELECTMEN'S OFFICE  
TOWN HALL  
MEMORIAL SQUARE  
WHITINSVILLE, MA

2. Article Number

(Transfer from ser

7002 0860 0008 4092 1634

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

Castane Hills

Agent

Addressee

B. Received by (Printed Name)

Castane Hills

C. Date of Delivery

11/5/02

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

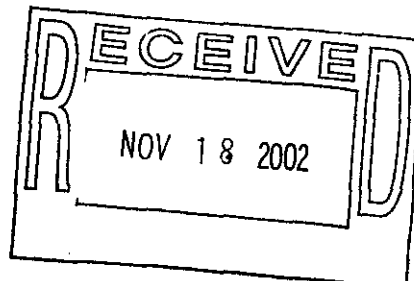
☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes



[Legal Notice]

## NOTICE OF AN ENVIRONMENTAL RESPONSE ACTION

ATF Davidson  
1 Main Street, Northbridge, MA 01588  
RTN 2-0111

Pursuant to the Massachusetts Contingency Plan [310 CMR 40.1403(3)] adopted by the Department of Environmental Protection, notice is hereby given that the item(s) checked below applies to this site:

- ☐ Implementation of Phase IV Remedial Actions
- ☐ Use of Respirators & Protective Clothing
- ☐ Sampling of Private Drinking Water Wells/ Indoor Air/ or Surficial Soils at Residential Property
- ☐ Immediate Response Action (IRA) involving Imminent Hazard
- ☐ IRA Completion Statement Availability for above IRAs
- ☐ Release Abatement Measure (RAM) Implementation
- ☐ Phase I Initial Site Investigation Report Availability
- ☐ Subsequent Phase Report Availability
- ☒ Response Action Outcome (RAO) Statement Availability
- ☐ Downgradient Property Status (DPS) Submittal Availability.

### PROJECT SUMMARY (Purpose, Nature, Expected Duration, etc.)

Elevated levels of chlorinated solvents and barium were identified in groundwater at the subject site in 1985. Subsequent assessment and monitoring activities indicated that contaminant concentrations had been reduced by natural attenuation to levels within the applicable Method 1 Cleanup Standards established by the DEP.

A Class B-1 Response Action Outcome (RAO) Statement was submitted to DEP in December 1998 demonstrating that a Permanent Solution had been achieved with a level of No Significant Risk of harm to health, safety, public welfare and the environment. Following a DEP Audit, a RAO Statement Addendum was prepared and submitted to DEP which provided additional documentation in support of the RAO.

Any person interested in obtaining additional information or purchasing a copy of the document(s) (where applicable) may contact Corey Management Company, Inc. (781-275-2970) or the Central Regional Office of the Mass. Dept. of Environmental Protection (508-792-7650).

cc: Chief Municipal Officer  
Board of Health

[Legal Notice]



900 Third Avenue  
New York, NY 10022-4751

Tel: (212) 593-1000  
Fax: (212) 593-2631

MMB 3/6/02  
RTENF  
3-6-02

MAR - 5

February 27, 2002

Mr. James Moody  
Enforcement Coordinator  
MADEP  
Central Regional Office  
627 Main Street  
Worcester, MA 01608

RE: ATF-Davidson, 1 Main Street, Northbridge, MA  
RTN 2-00111

Dear Mr. Moody:

Pursuant to our telephone conversations of February 27, 2002, it is my understanding that deadlines for action to be taken as specified in the Notice of Noncompliance Summary (NON-CE-01-3103) and Notice of Audit Findings will be indefinitely extended.

On February 20, 2002 Kroll provided the Department a response to the Notice of Noncompliance and Notice of Audit Findings. In that correspondence Kroll set out specific references to information that the Department had not taken into account during its Audit. Kroll also requested a meeting with the Department to allow all parties the opportunity to discuss the historic studies and Audit. At this time we have not received a response from the Department.

As you stated, the Department will extend the compliance dates, pending the requested meeting.

Should this not actually reflect your understanding, please contact me as soon as possible.

Thank you for your response and assistance with this matter.  
KROLL INC.

A handwritten signature in black ink, appearing to read 'Neal M. Drawas'.

Neal M. Drawas  
Managing Director

cc. L. Jolles, Arcade Realty Trust





900 Third Avenue  
New York, NY 10022-4751

Tel: (212) 593-1000  
Fax: (212) 593-2631

RTENF

February 20, 2002

Mr. Greg Root  
Commonwealth of Massachusetts  
Department of Environmental Protection  
Central Regional Office  
627 Main Street  
Worcester, MA 01608

RE: CRWSC-Northbridge  
ATF-Davidson  
1 Main Street  
RTN 2-00111

FEB 25 2002

DEP  
CENTRAL

Dear Mr. Root:

We have reviewed the Notice of Audit Findings and the Notice of Noncompliance issued on January 23, 2002. In completing our review, it is apparent that certain key documents and information included in the various documents previously submitted to the Department were excluded from the Department's review. Pursuant to our telephone conversation of February 13, 2002, it is our desire to meet with the Department to review the historical studies and technical information we believe adequately addressed the deficiencies cited by the Department. In preparation for such a meeting, I am providing herein, specific reference to that information.

On behalf of Arcade Realty Trust, I am also requesting that the Department delay of the implementation schedules as specified in the Notice of Audit Findings and Notice of Noncompliance. This is necessary to allow the Department time to review this information and for all parties to meet to discuss the Audit Findings.

The following responses correspond to the cited non-compliance items specified in the Department's Notice of Noncompliance Summary (NON-CE-01-3103) dated January 23, 2002.

**1. Failure to Meet Phase I Performance Standards, 310 CMR 40.0482**

Illustrated site boundaries: The Phase I report included a Site Plan entitled "Monitoring Well Location Plan". This figure illustrated the property boundaries of the ATF-Davidson property, and monitoring wells. The Plan was taken from previous studies prepared by Caswell, Eichler and Hill that were on file with the

Department. We acknowledge that the figure did not specifically identify the area of impacted groundwater. A Phase I Addendum can be provided that specifically identifies the "Site".

Subsurface utilities: There are no subsurface utilities within the Site, i.e. the groundwater impact area. The Phase I did not specify this fact. A Phase I Addendum can be provided that specifically states that no subsurface utilities exist within the Site.

Legible denotations of monitoring wells- A site plan was included in the Phase I entitled (Monitoring Well Location Plan). A Monitoring Well Plan was also included as Figure 1 in the Caswell, Eichler & Hill, "Additional M-8 Investigations" Report, dated March 1987 and provided as Appendix 4 of the Phase I Report. A Site Plan showing the locations of the monitoring wells was included as Figure 3 of the Response Action Outcome Statement dated December 1988. We are also aware that Roy F. Weston, Inc. prepared a Property Site Map (Figure 4) that also identifies the locations of the monitoring wells. If necessary, a Phase I Addendum can be provided that clearly identifies the location of all monitoring wells. 2002

Sediment sampling locations- Caswell, Eichler & Hill conducted two sediment studies in July 1985 and December 1985. Appendix E of the Caswell, Eichler & Hill, "Additional Investigations" Report, dated January 1986 contained a sample location plan. This report was included as Appendix 2 of the Phase I Report.

Floor and storm drain locations- There are no floor or storm drains within the Site, i.e. the groundwater impact area. The Phase I did not specify this fact. A Phase I Addendum can be provided that specifically states that no floor or storm drains exist within the Site.

General areas of Oil and Hazardous Material (OHM) Release- Based on previous consultant reports; discussions with ATF-Davidson representatives; historical correspondence from DEQE; and our own site inspection, there were no identified areas of oil and hazardous material releases within the Site, or within the property. The Phase I did not specify this fact. A Phase I Addendum can be provided that specifically states that no Oil and Hazardous Materials Release areas were known to exist.

Historical hazardous materials usage- As stated in the Phase I Report the "Arcade" building was initially (1944) constructed by Whitin Machine Works as an equipment warehouse. Some time after 1966, ATF-Davidson used the building for the production of graphic arts equipment. The only processes known to occur were metal turning, milling, grinding, metal treatment, assembly, painting and testing. There was no indication from discussions with the ATF-Davidson representatives or documents on file with the Department that hazardous materials were used on-site. At the time the Phase I Report was prepared, ATF-Davidson had already vacated the property and there was no evidence of

historical hazardous materials usage. As stated in the report, the principal facilities for formerly manufacturing operations that utilized hazardous materials were located at the adjacent mill property. The Phase I report does cite the present of an electric transformer. It should be noted that the DEQE had been involved with ATF-Davidson since the early 1980's. This included the period when ATF-Davidson maintained operations at the Arcade property. It was our understanding that the only unresolved environmental matter in 1997 was groundwater contamination associated with RTN 2-0111.

List of permits and environmental compliance history- There were no local, state or federal environmental permits, or oil and/or hazardous material storage permits issued for the Site or property. The Phase I did not specify this fact. There were no records of non-compliance notices, citations or Consent Agreements for the Site or property. The Phase I did not specify this fact. However, the Phase I specifically cited historical studies pertaining to the compliance history of ATF-Davidson in response to DEQE's specific requests. A Phase I Addendum can be provided that specifically states that no environmental permits or citations were issued against the Site or property.

Estimation of the population within 0.5 miles of the Site- This information was provided in Section IVA of the Numerical Ranking System Scoresheet submitted to the Department on April 4, 1997. A Phase I Addendum can be provided that specifically states that the population within 0.5 miles of Site ranges from 100-999 individuals.

Number of institutions within 500 feet of the Site- This information was provided in Section IVA of the Numerical Ranking System Scoresheet submitted to the Department on April 4, 1997. A Phase I Addendum can be provided that specifically states that there are no institutions within 500 feet of the Site.

Names and addresses of all Potentially Responsible Parties- The name and address of the Person Undertaking Response Action was listed on the BWSC-108 Form submitted with the Phase I Report. The only other known owners of the property were ATF-Davidson and White Consolidated, Inc. which was stated in the Phase I. It is our understanding that 310CMR40.043 does not require the addresses of all potentially responsible parties, but states that a list may (emphasis added) be provided in the Phase I.

Mumford River sediment studies- The Phase I report includes two studies by Caswell, Eichler & Hill pertaining to chromium in the Mumford River sediments. The studies were reported in October 1985 (Phase I-Appendix 1) and January 1986 (Phase I-Appendix 2). The Phase I report specifically reported that ATF-Davidson and White Consolidated, Inc. stated that chromium was never used at the Arcade facility, and chromium was not a constituent of concern based on the on-site sampling and analysis. The January 1986 Caswell, Eichler & Hill report clearly demonstrated that the highest concentrations of chromium were located in

sediment samples upstream of the Arcade property. Analytical results of groundwater samples collected from the Arcade monitoring wells reported non-detectable levels ( $<0.005$  mg/L) of chromium (Caswell, Eichler & Hill, October 1985; Phase I-Appendix 1).

Soil and groundwater analysis for heavy metals- Groundwater results for heavy metals were reported by Caswell, Eichler & Hill in their October 1985 Report. None of the reported laboratory results indicated an exceedence of GW-1 standards with the exception of barium. In January 1986, in response to the DEQE's request, Caswell, Eichler & Hill performed heavy metal analyses of arsenic, barium and zinc in soil. According to their findings, none of the results exceeded S-1 standards.

Information in the file indicates that electroplating rinsewaters may have been disposed at the Site- The Department has indicated that this allegation is based on a June 19, 1991 DEP report that was not in the Department's files at the time of our investigation. That 1991 report alleged that the Arcade property was filled with constituents consisting of 90% spend foundry sand, 5% coal ash, 5% paint, plating sludge, plating rinsewaters, bromide salt baths, solvents and cutting oils. The information source that allowed the author to make that quantitative statement is unknown to us. We also question the validity of that statement having reviewed the historic reports submitted by the previous owner/operator and their consultants, and having interviewed key facility personnel regarding this specific matter. ATF-Davidson has always represented that no hazardous substances were deposited in the fill area. In May 1984, ATF-Davidson certified to the USEPA that prior to 1965 all of processing and waste waters were discharged into the Mumford River from the adjacent mill property. From 1965 until 1984 all wastewater was treated at the adjacent mill property. From 1984, ATF-Davidson discontinued the use of the on-site treatment system and shipped all wastes off-site. Based on historical documents, former owner testimony and on-site site assessment data there is no information to support the statement that electroplating rinsewaters were disposed at the Site. 2002

Laboratory Analytical Reports and Chain of Custody- The documents were inadvertently left out of the Phase I report. They are available and can be provided in a Phase I Addendum report.

Approximate Limit of Contamination- Page 7 of the Phase I Report specifically identifies the location of contamination. The Phase I report states, "Analysis of groundwater samples indicated that VOC contamination was present only in monitoring wells M-3, M-6 and M-8. Analysis of samples from the other wells did not reveal VOC constituents. Analysis of the groundwater samples for priority pollutant metals; barium and cyanide revealed levels well below the Massachusetts Drinking Water Standards for all metals except barium. Barium was identified at concentrations near or slightly above that standard in monitoring wells M-4, M-5, M-6 and M-8.

### **310CMR 40.0482: Performance Standards**

A Phase I Report shall provide sufficient information to meet the requirements of the Numerical Ranking System and Tier Classification process described in 310CMR 40.0500 or where appropriate, support a Response Action Outcome Statement filed for a site prior to Tier Classification.

As previously stated, the Phase I report included either in the text portion or Appendices sufficient information. If necessary, a Phase I Addendum can be prepared that would clearly state any information that the Department believes is necessary to support the NRS and Tier Classification submitted to the Department in March 1997.

### **Failure to Meet Response Action Outcome Performance Standards, 310CMR 40.1004**

The MCP requires the use of Method 2 or 3 if contamination is present in significant concentrations in media other than soil or groundwater.

This requirement does not pertain to this Site, as the chromium contamination found in the river sediments was not associated with the Arcade property activities. As previously stated, Caswell, Eichler & Hill demonstrated through their sampling and analysis of benthic samples and on-site groundwater monitoring, that chromium was present at greater concentrations upstream of the Site, and all groundwater samples from the on-site monitoring wells had non-detectable chromium concentrations. It was the conclusion of Caswell, Eichler & Hill, the DEQE and Kroll that the chromium present in the river sediments was not associated with the Arcade property. Therefore, the RAO Statement was in compliance with the Performance Standards.

No Exposure points were identified,

The only exposure points for the known groundwater contamination were the individual monitoring wells. Therefore, the RAO Statement was in compliance with the Performance Standards.

No exposure point concentrations were calculated.

This requirement does not pertain to this Site for the VOC contamination in groundwater. Therefore, the RAO Statement was in compliance with the Performance Standards.

The extent of the release was not indicated per 310CMR 40.0904

It is not clear what the cited deficiency refers to. As previously noted only three monitoring wells were found to have VOC and barium concentrations in excess the applicable standards. All other wells within the Site were less than standard; therefore the extent of the release was inherently defined. Therefore, the RAO Statement was in compliance with the Performance Standards.

There was no characterization of the OHM per 310CMR40.0904(3)

It is not clear what the cited deficiency refers to. The only known materials deposited in the fill area were coal ash and foundry sands. Both of which may have been the source of barium. As stated in the Phase I report and historical studies, the presence of VOC appeared to be from an unknown but localized source. Therefore, the RAO Statement was in compliance with the Performance Standards.

The Phase I recommends continued groundwater sampling for two to three years to ensure continued reduction of contaminant concentrations levels, however, no full round of groundwater samples were collected subsequently.

Groundwater samples were collected from all impacted wells in January 1997, May 1998, and August 1998. The purpose for recommending continuing groundwater monitoring was to support the fact that the VOC concentrations were decreasing over time due to natural attenuation. By continuing to monitor groundwater, we had sufficient data to support a Response Action Outcome Statement. Groundwater monitoring was only required until such time as the applicable standards were achieved. At that time, further monitoring was not required, and the RAO Statement was filed. Therefore, the RAO Statement was in compliance with the Performance Standards.

#### **Failure to Meet Public Notice Requirements, 310CMR40.0485**

FEB 25 2002

No notice to Public officials regarding the availability of the Phase I and Tier Classification was found in files available to the Department

DEP  
CENT

The Phase I Report, Tier Classification and Numerical Ranking System Scoresheet were submitted to the Department in March and April 1997. Included in the submittals were:

- 1- Notice of an Environmental Response Action giving notice of a Phase I Initial Site Investigation Report Availability with copies submitted to the Chief Municipal Officer and Board of Health of the Town of Northbridge.
- 2- Notice of an Initial Site Investigation and Tier II Classification with transmittal request for publication to the Milford Daily News, Classified Ad. Dept.

If necessary, we would be please to provide the Department addition copies of the required notices that were filed with the appropriate authorities and local newspaper for publication.

Clipping from the newspaper or invoice as verification within seven (7) days of publication per 310CMR40.1403(6)(b).

The cited regulation does not specify that a clipping from the newspaper or an invoice is required. 310CMR40.1403(6)(b) states:

*At least three days prior to publication of the legal notice, a copy of the notice shall be sent to the Chief Municipal Officer and the Board of Health in the community (ies) in which the disposal site is located and in any other communities which are, or are likely to be, affect by the disposal site. If the Department does not publish the legal notice, then a copy of the legal notice which includes the date of publication and the name of the newspaper and a copy of the cover letter to the Chief Municipal Officer and Board of Health, shall be submitted to the Department within seven days of publication of the legal notice.*

As previously stated, a copy of the legal notice was sent to the Municipal Officer and Board of Health and was provided with the Phase I and Tier Classification. A copy of the legal notice was sent to the Milford Daily News was also provided to the Department. As we normally send a copy of the notice to the Municipal Officer and Board of Health without a cover letter, a cover letter was not provided with the various filings to the Department.

No copy of the notice to public officials regarding the availability of the RAO was found in the Department's files per 310CMR40.1403(f) and 40.1404(4).

A copy of the notice of the Response Action Outcome (RAO) Statement Availability to the Chief Municipal Officer and Board of Health was included as Appendix B of the RAO Statement filed with the Department.

Please note that we have not been able to locate the cited regulation 310CMR40.1403(f), and therefore can not respond to the allegation of non-compliance. 310CMR40.1404(4) does not apply to this Site as a Public Involvement Plan Site Designation does not apply to this Site.

**Violation of 310cmr 40.0620(3)(a) and 40.0620(6) (Class II) Submittal of LSP evaluation Opinion and Tier Classification by Transition Deadline**

The Transition Deadline for the site was August 2, 1995. A Tier Classification and an LSP Evaluation Opinion were submitted on March 12 and April 7, 1997, respectively.

Although the Department has indicated that this violation does not require further action, it is appropriate for us to ensure that accuracy of the facts of this citation. At the time that Arcade Realty Trust acquired the property it was their

understanding that all matters related to RTN 2-0111 were completed by ATF-Davidson in accordance with the MCP and DEP's requirements. This was supported by the fact that all correspondence from the Department was directed to ATF-Davidson. It was not until January 1997 with the issuance of a notice to publish a list of Tier I Site, that Arcade Realty Trust became aware of the situation. Immediately upon receipt of the Notice, Arcade Realty Trust retained Kroll to prepare the required filings that were subsequently submitted in March and April 1997.

As you can see, we do not agree with all of the allegations of non-compliance, and do not agree with the Department's requirement that the RAO Statement be retracted. It is our recommendation that the appropriate course of action is for the Department to meet with us to review the cited deficiencies and the information already submitted to the Department.

As previously requested, until we have had an opportunity to meet with the Department to review all issues, we respectfully request that the deadlines of action to be taken be reasonably extended.

Upon review of this information, should you have any questions and wish to schedule a meeting, please feel free to call me (978) 443-1833.

Thank you for your attention to this matter and our request.  
KROLL, INC.



Neal M. Drawas  
Managing Director

cc. Mary Gardner  
James Moody  
Leonard Jolles



2 Article Number



7106 4575 1292 5202 9238

3. Service Type **CERTIFIED MAIL**

4. Restricted Delivery? (Extra Fee) ☐ Yes

1. Article Addressed to:

**COMPLETE THIS SECTION ON DELIVERY**

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B. Date of Delivery

D. DUVERWAY RA 1-2402

C. Signature

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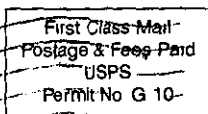
☐ Agent  
☐ Addressee  
☐ Yes  
☒ No

Brooks Realty Inc.  
Main Street

Walthamville, MA 01585

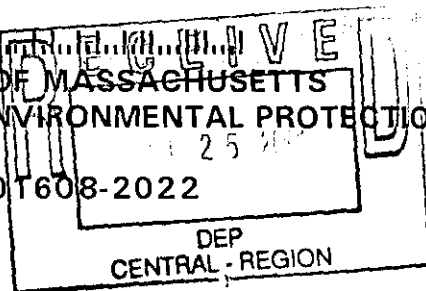
Attn: Leonard Jones

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Arcade Realty Trust  
 1 Main Street  
 Whitinsville, MA 01500  
 Attn: Leonard Jolly

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US Postal Service

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JANE SWIFT  
Governor

COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
Central Regional Office, 627 Main Street, Worcester, MA 01608

BOB DURAND  
Secretary

LAUREN A. LISS  
Commissioner

**CERTIFIED MAIL: RETURN RECEIPT REQUESTED**

JAN 23 2002

Arcade Realty Trust  
1 Main Street  
Whitinsville, MA 01588

Re: CRWSC - Northbridge  
ATF-Davidson  
1 Main Street

Attention: Leonard Jolles,  
Property Manager

RTN 2-00111  
NON-CE-01-3103

**NOTICE OF NONCOMPLIANCE**  
**M.G.L. c. 21E, 310 CMR 40.0000**

**FAILURE TO MEET PHASE I PERFORMANCE STANDARDS**  
**FAILURE TO MEET RAO PERFORMANCE STANDARDS**  
**FAILURE TO MEET MINIMUM PUBLIC NOTICE REQUIREMENTS**

Dear Mr. Jolles:

A review of records conducted by Department of Environmental Protection ("Department") personnel demonstrates that the above-referenced site is not in compliance with one or more laws, regulations, orders, licenses, permits, or approvals enforced by the Department. Be advised that the regulations that generally set forth the requirements for Phase I Reports, Response Action Outcomes, and Public Involvement are codified at Subparts D, J, and N of the Massachusetts Contingency Plan, 310 CMR 40.0400, 310 CMR 40.1000, and 310 CMR 40.1400, respectively.

The Department has included with and specifically incorporated into this writing a NOTICE OF NONCOMPLIANCE SUMMARY, which includes:

- (1) the requirements applicable to the response actions undertaken at, 1 Main Street, Northbridge, Massachusetts ("the Site");
- (2) the elements and occurrence(s) of the noncompliance necessitating the issuance of this Notice; and
- (3) the deadline(s) within which a return to compliance must be achieved, either by:

This information is available in alternate format by calling our ADA Coordinator at (617) 574-6872.

<http://www.state.ma.us/dep> • Phone (508) 792-7650 • Fax (508) 792-7621 • TDD # (508) 767-2788

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- (i) coming into compliance with the applicable requirements, or
- (ii) the submission of a written proposal to the Department setting forth how and when coming into compliance with the requirements will be achieved.

An administrative penalty may be assessed for every day from now on that you remain out of compliance with the requirements described in this Notice of Noncompliance. Notwithstanding this Notice of Noncompliance, the Department reserves the right to exercise the full extent of its legal authority in order to obtain full compliance with all applicable legal requirements, including but not limited to the assessment of civil administrative penalties, the commencement of a civil action in the court(s) of competent jurisdiction, or the commencement of a criminal prosecution in the court(s) of competent jurisdiction.

Please contact Mr. James Moody of the Central Regional Office at (508) 792-7650 x2703 if you have any questions or comments, or there is any ambiguity or confusion concerning this Notice. In responding to this Notice of Noncompliance, please reference the NON number found on the first page of this document to ensure proper acknowledgment of your response.

Sincerely,

JAN 23 2002  
Date: \_\_\_\_\_

  
Edmond G. Benoit  
Deputy Regional Director  
Bureau of Waste Site Cleanup

enclosure: NON Summary  
EGB\MKG\MEB\GLR

cc: Town of Northbridge, Board of Health ✓  
Town of Northbridge, Board of Selectmen ✓  
Neal Drawas, Kroll Associates, Inc., 900 Third Avenue, New York, NY 10022 ✓  
Thomas Potter, Audit Coordinator, BWSC, DEP-Boston ✓  
Office of Enforcement, DEP- Boston ✓  
James Moody, Enforcement Coordinator, BWSC, DEP-CERO ✓  
Daniel Hannon, Permits/Site Management, DEP-CERO ✓  
Michael Maher, Enforcement Coordinator, DEP-CERO ✓  
Nancy Smith, USEPA ✓  
Data Entry: [ C&E/NON AUDINS/NAFNON AUDCO/NON ]

**NOTICE OF NONCOMPLIANCE SUMMARY**  
**NON-CE-01-3103**

**ENTITY IN NONCOMPLIANCE**

Arcade Realty Trust

**LOCATION WHERE NONCOMPLIANCE OCCURRED OR WAS OBSERVED**

1 Main Street, Northbridge, Massachusetts

**DATE(S) WHEN NONCOMPLIANCE OCCURRED OR WAS OBSERVED**

December 18, 1998

---

**I. FAILURE TO MEET PHASE I PERFORMANCE STANDARDS, 310 CMR  
40.0482**

**DESCRIPTION OF ACTIVITY OR OMISSION IN NONCOMPLIANCE**

The Phase I report site plan had omissions that included: illustrated site boundaries, subsurface utilities, legible denotations of monitoring wells, sediment sampling locations, floor and storm drain locations, general areas of oil and hazardous material (OHM) releases. The report also did not include a history of hazardous material usage, a list of permits and environmental compliance history, an estimate of population within ½ mile of the site, the number of institutions within 500 feet of the site, and names and addresses of all potentially responsible parties.

Citing a 1985 report, the Phase I attributes significant levels of chromium in Mumford River sediments to the ATF-Davidson property (p. 8) or other upgradient source, but no subsequent investigation was conducted for chromium. Review of file materials for the audit did not reveal any indication of soil or groundwater analysis for heavy metals besides barium. Information in the file indicates that electroplating rinsewaters may have been disposed at the site, thus suggesting the potential for an on-site source. Sediment data from 1985 indicated the presence of chromium at concentrations of 64 ug/g, 410 ug/g, 250 ug/g, 400 ug/g, and 100 ug/g, in the river. No current sediment data was collected for the report.

The Phase I included a table of soil and groundwater data collected in 1996 and 1997, however, no chain of custody, nor laboratory analytical reports were included. No analytical method was specified.

The portion of the report pertaining to nature and extent of contamination was general discussion of levels of contamination and trends; no specific information was included that indicated where the approximate limits of the contamination were located.

## **DESCRIPTION OF REQUIREMENTS IN NONCOMPLIANCE**

### **310 CMR 40.0482: Performance Standards**

A Phase I Report shall provide sufficient information to meet the requirements of the Numerical Ranking System and Tier Classification process described in 310 CMR 40.0500 or, where appropriate, support a Response Action Outcome Statement filed for a site prior to Tier Classification.

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## **II. FAILURE TO MEET RESPONSE ACTION OUTCOME PERFORMANCE STANDARDS, 310 CMR 40.1004**

### **DESCRIPTION OF ACTIVITY OR OMISSION IN NONCOMPLIANCE**

The Response Action Outcome Statement (RAO) and supporting risk characterization were inadequate to meet RAO performance standards per 310 CMR 40.1004 in the following ways:

1. The MCP requires the use of Method 2 or 3 if contamination is present in significant concentrations in media other than soil or groundwater. Because chromium exists in river sediments and there is a potential that plating operations could be a source of the wastes, Method 1 cannot be utilized for the risk characterization unless another demonstration is made pursuant to relative risks to receptors, per 310 CMR 40.0942.
2. No exposure points were identified.
3. No exposure point concentrations were calculated.
4. The extent of the release was not indicated per 310 CMR 40.0904(2).
5. There was no characterization of the OHM per 310 CMR 40.0904(3).
6. The Phase I recommends continued groundwater sampling for two to three years to ensure continued reduction of contaminant concentration levels, however, no full round of groundwater samples were collected subsequently.

Failure to meet RAO Performance Standards is a Class II violation.

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## **III. FAILURE TO MEET PUBLIC NOTICE REQUIREMENTS, 310 CMR 40.0485, 40.1403 & 40.1404**

### **DESCRIPTION OF ACTIVITY OR OMISSION IN NONCOMPLIANCE**

- A. No notice to public officials regarding the availability of the Phase I and Tier Classification was found in files available to the Department, per 310 CMR 40.1403(6)(b).

- B. A copy of a legal notice draft was included in the Response Action Outcome, however, the Department requires a clipping from the newspaper or invoice as verification within seven (7) days of publication, per 310 CMR 40.1403(6)(b).
- C. No copy of a notice to public officials regarding the availability of the RAO was found in the Department's files, per 310 CMR 40.1403(f) and 40.1404(4).

Failure to meet minimum public notice requirements is a Class II violation.

### **DESCRIPTION OF REQUIREMENTS IN NONCOMPLIANCE**

#### **310 CMR 40.1403: Minimum Public Involvement Activities in Response Actions**

(3) At any time after the Department has been notified of a release or threat of release pursuant to 310 CMR 40.0300, the Chief Municipal Officer and Board of Health in the community(ies) in which the disposal site is located and in any other communities which are, or are likely to be, affected by the disposal site shall be notified of:

- (e) the availability of any Response Action Outcome Statements filed pursuant to 310 CMR 40.1000.

- 1. Notification may take the form of copies of correspondence which contain or summarize decisions regarding the Statement or a notice of the availability of the Statement.

(4) Notifications required by 310 CMR 40.1403(3)(a), (b), and (d) may be made orally or in writing. Notifications required by 310 CMR 40.1403(3)(c), (e), (f), and (g) shall be made in writing.

- (a) Oral notifications shall be followed by written notice within seven days of the oral notification.

- (b) A copy of each written notice shall be submitted to the Department concurrently with its filing with the Chief Municipal Officer and Board of Health.

(6) Following Tier Classification or reclassification pursuant to 310 CMR 40.0510, the following actions shall be taken to inform the public about the status of the disposal site's classification:

- (b) at least three days prior to publication of the legal notice, a copy of the notice shall be sent to the Chief Municipal Officer and the Board of Health in the community(ies) in which the disposal site is located and in any other communities which are, or are likely to be, affected by the disposal site. If the Department does not publish the legal notice, then a copy of the legal notice which includes the date of publication and the name of the newspaper, and a copy of the cover letter to the Chief Municipal Officer and Board of Health, shall be submitted to the Department within seven days of publication of the legal notice; and



**DESCRIPTION OF DEADLINES OF ACTION TO BE TAKEN**


An Audit Follow-up Plan to meet the requirements of a Phase II Scope of Work should be submitted to the Department by **March 1, 2002**. Please note that the site was tier classified on March 12, 1997, therefore, the Tier II classification is in effect until March 11, 2002. Sixty days prior to expiration of the Tier II classification, you should submit a Tier II extension request using form BWSC-107. In order for response actions to continue, a retraction of the Response Action Outcome Statement is necessary. The RAO retraction should be completed by **March 1, 2002**.

A Phase II – Comprehensive Site Assessment and a Phase III Remedial Alternatives Plan, if applicable or RAO should be submitted by **October 1, 2002**. A Phase IV Remedy Implementation Plan, if applicable, or an RAO should be submitted by **January 1, 2003**. Should Phase V activities be required, an RAO should be submitted no later than **December 31, 2003**.

Notify municipal officials of the availability of the Phase I – Limited Site Investigation and of the requirement to file a Tier II Extension to retain Tier II status beyond the March 11, 2001 expiration date by **March 1, 2002**. Copy the municipal correspondence to the Department within one week of mailing to the officials. Notify municipal officials of the availability of the Phase II report and upon completion of all subsequent Phase reports. The Department should be copied on these notices, also. Notify municipal officials upon re-filing an RAO in the future.

Sincerely,

JAN 23 2002  
Date \_\_\_\_\_

  
Edmond G. Benoit  
Deputy Regional Director  
Bureau of Waste Site Cleanup

2 Article Number



7106 4575 1292 5202 9429

3. Service Type **CERTIFIED MAIL**

4. Restricted Delivery? (Extra Fee) ☐ Yes

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C. Signature

**X** *[Signature]*

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☐ Addressee

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☐ Yes  
☐ No

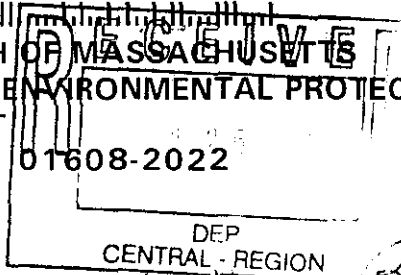
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Sent To:

Arcade Realty Trust  
1 Main Street  
Whitinsville, MA 01568  
Attn: Leonard Jolles



COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
Central Regional Office, 627 Main Street, Worcester, MA 01608

JANE SWIFT  
Governor

BOB DURAND  
Secretary

LAUREN A. LISS  
Commissioner

JAN 23 2002

**CERTIFIED MAIL: RETURN RECEIPT REQUESTED**

Arcade Realty Trust  
1 Main Street  
Whitinsville, MA 01588

Re: CRWSC - Northbridge  
ATF-Davidson  
1 Main Street

Attention: Leonard Jolles,  
Property Manager

RTN 2-00111

---

**NOTICE OF AUDIT FINDINGS  
NOTICE OF NONCOMPLIANCE  
INTERIM DEADLINE**

---

Dear Mr. Jolles,

On December 5, 2001, Arcade Realty Trust (hereafter referred to as you/your) was notified that the Massachusetts Department of Environmental Protection (the Department) had begun to audit response actions conducted to address the release of hazardous material at the location identified above. In particular, the audit focused on the tier classification at this site. This notice informs you of the results of the Department's audit.

**DETERMINATION**

As a result of the audit, the Department has determined that response actions were not performed in compliance with the requirements of the Massachusetts Contingency Plan (MCP). Violations were identified that require additional actions to be taken under the supervision of a Licensed Site Professional (LSP) in order to come into compliance with the MCP. The Audit Memorandum (attached) describes the activities Department personnel performed during the audit and summarizes relevant site information. A Notice of Noncompliance (attached) lists the identified violation(s) that require further action at this time.

This information is available in alternate format by calling our ADA Coordinator at (617) 574-6872.

<http://www.state.ma.us/dep> • Phone (508) 792-7650 • Fax (508) 792-7621 • TDD # (508) 767-2788

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The activities that are in noncompliance and the actions the Department wants you to take to come into compliance are described in the Notice of Noncompliance. The Notice of Noncompliance describes: (1) each activity identified during the audit which is in noncompliance, (2) the requirements violated, (3) the action the Department now wants you to take, and (4) the deadline for taking this action. An administrative penalty may be assessed for every day from now on that you are in noncompliance.

Additionally, the Department has determined that a violation of applicable requirements of the Massachusetts Contingency Plan (MCP) occurred, but do not warrant correction. Therefore, no additional actions are necessary for this violation at this time (see "Violations were identified that do not require further action"). The Audit Memorandum (attached) describes the activities Department personnel performed during the audit, summarizes relevant site information, and lists the violations that do not need further correction.

Although the Department is not requiring additional actions to address the violation identified in the Audit Memorandum, the Department may include this violation to establish a pattern of noncompliance if future enforcement actions are pursued.

A written Audit Follow-up Plan must be submitted to the Department in accordance with 310 CMR 40.1160. The Audit Follow-up Plan must set forth how and when you propose to confirm, demonstrate or achieve compliance with M.G.L. c.21E, the MCP and any other applicable requirements. To avoid enforcement actions, you must submit the Audit Follow-up Plan by no later than **March 1, 2002** including the form established by the Department (BWSC Transmittal Form 111, attached) for said purpose.

Pursuant to 310 CMR 40.1160(4), the Department has ninety (90) days to approve the plan. In approving the Audit Follow-up Plan, the Department may: (a) establish conditions, including but not limited to conditions setting forth the Department's role in overseeing elements of the Plan; (b) establish Interim Deadlines; (c) establish requirements for documentation and/or submittal information; and (d) take any other actions authorized by M.G.L. c. 21E, 310 CMR 40.0000, or any other applicable law. If you do not receive written approval from the Department within ninety (90) days of receipt of your plan, your plan is considered approved and you should proceed to implement the plan as proposed.

This deadline is hereby established as an Interim Deadline pursuant to the Department's authority under M.G.L. Chapter 21E, Section 3(j) and 310 CMR 40.0167.

#### **LICENSED SITE PROFESSIONAL**

A copy of this notice has been sent to Neal Drawas, LSP#9844, the LSP-of-Record for the Disposal site.

## LIMITATIONS

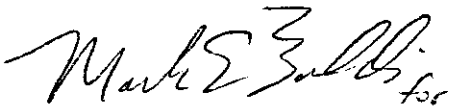
The Department's findings were based upon the certainty of the information reviewed during the audit. These findings do not: (1) apply to actions or other aspects of the site that were not reviewed in the audit, (2) preclude future audits of past, current, or future actions at the site, (3) in any way constitute a release from any liability, obligation, action or penalty under M.G.L. c. 21E, 310 CMR 40.0000, or any other law, regulation, or requirement, or (4) limit the Department's authority to take or arrange, or to require any Responsible Party or Potentially Responsible Party to perform, any response action authorized by M.G.L. c. 21E which the Department deems necessary to protect health, safety, public welfare, or the environment.

If you have any questions regarding this Notice or any requirements contained in it, please contact Greg Root at 508-849-4017. Please reference the Release Tracking Number 2-0111 in any future correspondence to the Department regarding the site.

Very truly yours,

JAN 23 2002

Date: \_\_\_\_\_

  
Mary Gardner  
Section Chief  
Audits/Site Management  
Bureau of Waste Site Cleanup

0111- noaf

### Attachments:

Audit Memorandum  
Audit Follow-up Plan Transmittal Form & Post-Audit Completion Statement (BWSC-111)  
Notice of Noncompliance

### cc :(w/o Attachments):

Town of Northbridge, Board of Selectmen ✓  
Town of Northbridge, Board of Health ✓  
Neal Drawas, Kroll Associates, Inc., 900 Third Avenue, New York, NY 10022 ✓  
Thomas M. Potter, Audit Coordinator, DEP-Boston ✓  
Nancy Smith, USEPA ✓  
Data Entry: [ RAO/ACTAUD AUDCO/INTLET AUDCO/NAFNON PHASE I  
ACTAUD ]

## AUDIT MEMORANDUM

### I. AUDIT ACTIVITIES

The audit consists of the following activities:

- An examination of documents within the Department's records or in other public records.
- A Notice of Audit dated December 5, 2001.
- A Site Inspection on December 14, 2001.

### II. SITE SUMMARY

The 27-acre site is currently leased for light industrial, warehousing and distribution uses. The Mumford River is adjacent to the site. The number of workers on the site is unknown. The nearest residence is approximately 100 feet from the site. No schools or day care facilities are located within 200 feet of the site. Potential source areas include: foundry sand in an unlined landfill that was reported to include 90% foundry sand, 5% coal ash, 5% paint, plating sludge, plating rinsewaters, bromide salt baths, solvents and cutting oils; sediment in the Mumford River contaminated with electroplating waste (maximum 410 mg/kg chromium).

#### Chronology

April 30, 1985	Notification of release to Department
April 30, 1985	NOR issued
October 15, 1987	Listed as a Location to be Investigated
March 12, 1997	Submittal of Phase I – Limited Site Investigation
March 12, 1997	Submittal of Tier II site classification
April 7, 1997	Submittal of LSP Evaluation Opinion
December 18, 1998	Class B-1 RAO was filed for the ATF-Davidson property

A subsurface investigation was conducted from October 1996 through January 1997 for the Phase I investigation, which included sampling of soil, sediment and groundwater media, but not surface water. Assessment activities beyond Phase I included sampling two monitoring wells in May 1998. Five monitoring wells located on-site were sampled and analyzed in August 1998 for barium and volatile organic compounds. The five wells sampled included resampling of two monitoring wells tested in May 1998. Seven geoprobe wells were advanced on January 17, 1997 and soil and groundwater samples were collected.

The 1997 geoprobe wells included one well (GP-6) where 74 ug/L of vinyl chloride were discovered in groundwater. Vinyl chloride was also discovered in groundwater from monitoring wells M-6 and M-8 at levels of 17.8 ug/L and 62.5 ug/L, respectively in October 1996. Soil from GP-6 included 25 ug/g (units unclear) vinyl chloride. A concentration of 290 ug/g acetone was present in soil from GP-2 and 200 ug/g (units unclear) acetone in soil from well GP-5.



Soil at the site consists of black foundry sand, native sand, fine gravel, cobbles and boulders with little silt. Groundwater flows south toward the Mumford River. Flow rate is approximately 23 feet per year. Bedrock was discovered to exist approximately 15 feet below grade. Groundwater is present at approximately 5 feet below grade.

No remediation has been conducted at the site and a Class B-1 RAO was submitted.

### **III. DOCUMENTS AUDITED**

"Phase I Initial Site Investigation", March 1997, prepared by Neal Drawas, LSP No. 9844, Kroll Associates, Inc.

"Response Action Outcome (RAO) Statement", December 1998, prepared by Neal Drawas, LSP No. 9844, Kroll Associates, Inc.

"Tier Classification", March 1997, prepared by Neal Drawas, LSP No. 9844, Kroll Associates, Inc.

#### **III (a). Risk Characterization**

The RAO statement indicates that Method 1 cleanup standards were used to evaluate contamination levels at the site, the report indicates that a Method 1 risk characterization was utilized to determine No Significant risk, however, the Department has determined that several elements of a risk characterization were not included. No exposure points were identified, no exposure point concentrations were listed, there was no characterization of the oil and hazardous materials, per 310 CMR 40.0904(2), and the extent of the release was not defined. Maximum concentrations of contaminants in groundwater are: tetrachloroethylene 18 ug/L, trichloroethylene 3 ug/L, dichloroethylene 90 ug/L, vinyl chloride 82 ug/L, barium 4,700 ug/L. Maximum concentrations in soil are as follows, however, units were not specified in the table contained in the Phase I report: acetone 290 (possibly ug/kg), vinyl chloride (25 possibly ug/kg).

Soil and groundwater categories listed in the RAO are S-2 and GW-3. Groundwater exists at approximately five feet below grade across the site, therefore, GW-2 applies.

### **III. SITE INSPECTION**

On December, 14, 2001, Mr. Greg Root of the Department met on-site with Mr. Neal Drawas, LSP of Record for the site from Kroll Associates, Inc. The site itself was observed, but no groundwater was collected for observation. Soil consists largely of coal-fired furnace waste and slag from smelting operations. Surface water in the Mumford River was observed to be free of oily sheens, other visible contamination and odors. No interior areas were observed, since sources of contamination have been determined to be outside disposal of wastes.

#### **IV. DETERMINATIONS**

On the basis of the activities performed during the audit and in reliance upon the accuracy of that information, the Department makes the following Determination.

##### **A. Violations were identified that require further action**

Please refer to the Notice of Noncompliance (attached) relative to the activities in noncompliance and the actions the Department wants you to take to come into compliance.

##### **B. Violations were identified that do not require further action**

Additionally, another violation was determined for which no further steps are necessary. Although the Department is not requiring additional actions to address the violation identified above, the Department may use this violation to establish a pattern of noncompliance when pursuing future enforcement actions.

Violation of 310 CMR 40.0620(3)(a) and 40.0620(6) (Class II) – Submittal of LSP Evaluation Opinion and Tier Classification by Transition Deadline

The Transition Deadline for the site was August 2, 1995. A Tier Classification and an LSP Evaluation Opinion were submitted on March 12 and April 7, 1997, respectively.



COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
CENTRAL REGIONAL OFFICE

*File*

WILLIAM F. WELD  
Governor

ARGEO PAUL CELLUCCI  
Lt. Governor

TRUDY COXE  
Secretary

DAVID B. STRUHS  
Commissioner

TRANSMITTAL:

TO: Mike Jennings  
Roy F. Weston, Inc.  
217 Middlesex Turnpike  
Burlington, MA 01803

*Site # 2-0111  
Covitch  
Main St.  
Northbridge*

INCLUDES:

Cover pages of Covitch and Arcade Phase I reports

Laboratory reports from 1996 sample analyses at Covitch Property

Table of 1996-1997 Laboratory Results of sampling on the Arcade Property

If you have any questions contact me at (508) 792-7653 Ext. 3841.

Very truly yours,

*Gregory Root*

Greg Root  
Environmental Analyst  
Waste Site Cleanup

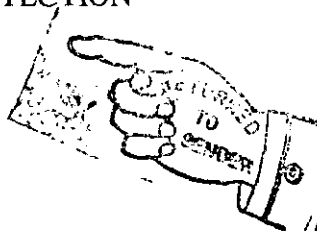
Commonwealth of Massachusetts

DEPARTMENT OF ENVIRONMENTAL PROTECTION

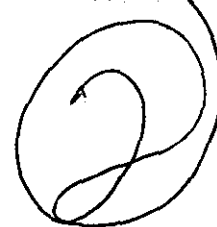
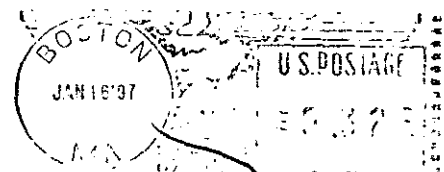
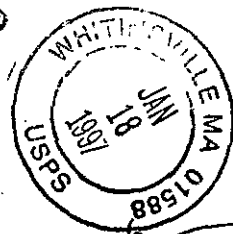
Bureau of Waste Site Cleanup

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Boston, Massachusetts 02108



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Lt. Governor

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Secretary

DAVID B. STRUHS  
Commissioner

ATF DAVIDSON  
Attn: PHILIP WHITNEY,  
MAIN ST.  
NORTHBRIDGE, MA 01534

*Returned  
to Sender*

January 8, 1997

RE: Publication of Tier I Disposal Site for Failure to Take Action  
Release Tracking Number: 2-0000111  
Site Information: ATF DAVIDSON  
1 MAIN ST, NORTHBRIDGE, MA

Dear Sir or Madam:

The purpose of this letter is to notify you that the Department of Environmental Protection (DEP) is preparing to publish a list of Tier I disposal sites, including "failure to take action" sites. The Tier I site list will include the above referenced property (Property) because either no response actions have been taken at the Property or response actions have not been conducted in compliance with applicable deadlines for conducting such actions. If appropriate actions are taken by March 14, 1997, the Property will not be included as a "failure to take action" site. If you are a potentially responsible party and take appropriate action you may also avoid other DEP enforcement.

Information available to the Department indicates that a release of oil and/or hazardous materials may have occurred at the Property. Chapter 21E of the Massachusetts General Laws and the Massachusetts Contingency Plan (the "MCP") govern the work required for assessment and cleanup of releases of oil and/or hazardous materials. Our files indicate that required assessment and cleanup activities at the Property have either not been started or have not been conducted in compliance with response action deadlines. The identification of releases and the initiation of response actions is critical to protecting public health and the environment. Therefore, in addition to publishing a list of Tier I sites, DEP will initiate enforcement against potentially responsible parties for those sites in noncompliance with the provisions of the law.

The Site List

In order to avoid publication of this Property on the Tier I, "Failure to Take Action" list, DEP must receive one of the following documents by March 14, 1997:

- A) A Tier Classification Submittal prepared by a Licensed Site Professional (LSP) in accordance with the MCP at 310 CMR 40.0500, and a Tier I Permit application if applicable;
- B) A Response Action Outcome (RAO) Statement prepared by an LSP in accordance with 310 CMR 40.1000; or
- C) A Downgradient Property Status (DPS) Submittal prepared by an LSP in accordance with 310 CMR 40.0180.

If the above referenced Property was reported to DEP before 10/1/93, the following documents may be submitted instead of A, B or C above:

- D) An LSP Evaluation Opinion (described in 310 CMR 40.0600) indicating that:
1. there has not been a reportable release at this site and no response actions are necessary;
  2. a reportable release has occurred but previous response actions sufficiently cleaned up the release to achieve a Class A or Class B Response Action Outcome (RAO);
  3. the site is adequately regulated by another program in accordance with the MCP at 310 CMR 40.0110; or
- E) A statement and supporting documentation in accordance with 310 CMR 40.0610(4) that a report was filed with the Department prior to October 1, 1993, which explicitly concluded that no further remedial actions were necessary.

**Enforcement**

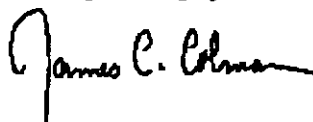
Regardless of the status of a property on the Tier I site list, responsible parties are required to take actions under MGL Chapter 21E and the MCP. Potentially responsible parties include current owners for any site, as well as past owners where hazardous materials have been released. Please consider carefully the enclosed attachment for information about potentially responsible parties. If you are a potentially responsible party you may be subject to certain enforcement actions for failure to take appropriate action as described above. The potential for enforcement actions may be avoided if you submit a written statement or notification certified under pains and penalties of perjury, to DEP by February 17, 1997 as follows:

- 1) A written statement that you do not have nor did you ever have a connection to the Property that makes you a potentially responsible party. Include any information you have regarding those currently connected with the Property;
- 2) A written notification pursuant to 310 CMR 40.0172 asserting and demonstrating that you are financially, legally or technically unable to perform the above response actions; or
- 3) A written statement describing all response actions to date and a schedule for resuming response actions at the Property.

All submittals must be made to the Bureau of Waste Site Cleanup in the DEP Regional Office where the site is located (see attached map). Certain submittals, as indicated above, require you to employ a Licensed Site Professional (LSP) to provide the required information. LSP information and a list of LSPs can be obtained from the LSP Board of Registration at (617) 556-1091. Please note that if you do begin response actions, while you may avoid certain enforcement actions, you will be subject to Annual Compliance Assurance Fees for each year in which response actions have been or are conducted at this Property.

A copy of the MCP may be obtained from the Statehouse Bookstore in Boston by calling (617) 727-2834 or in Springfield by calling (413) 784-1376. If you have other questions about the requirements for this Property described above, please call the MCP Help Line at (617) 338-2255 from the 617 area code and outside Massachusetts or (800) 462-0444 from the 413 and 508 area codes.

Very truly yours,



James C. Colman, Assistant Commissioner  
Bureau of Waste Site Cleanup

Encl.: Attachment  
Regional Map

## **Attachment: Potentially Responsible Parties Under MGL Chapter 21E**

Under Massachusetts General Law (MGL) Chapter 21E, holds people responsible for ensuring that releases of oil and/or hazardous materials are cleaned up include current owners or operators of a site where a release of oil and/or hazardous materials has occurred, and any person who owned or operated a site at the time hazardous material was stored or disposed of. Potentially responsible parties also include persons who transported, disposed of, stored or treated hazardous material at a site from which there is or has been a release or threat of release of such material, or any persons who otherwise caused or are legally responsible for a release or threat of release of oil or hazardous material at a site.

Liability under Chapter 21E is "strict", meaning it is not based on fault, but solely on a person's status as an owner, operator, generator, transporter or disposer. It is also joint and several, meaning that a responsible party may be liable for all response action costs incurred at the site, regardless of the existence of any other liable parties. Please consult Section 5(a) of MGL Chapter 21E for the complete information regarding your potential liability.

If you are a potentially responsible party and fail to initiate actions required by MGL Chapter 21E and the Massachusetts Contingency Plan (MCP), you may be subject to administrative penalties for failing to conduct response actions in a timely manner. In addition, the Department is authorized by MGL c. 21E to have the work performed by its contractors. In this case, you may be held liable for up to three times DEP's costs for conducting response actions at a property should DEP intervene. By taking such actions yourself, you can avoid liability for response action costs incurred by the Department and its contractors in performing these actions, and any sanctions which may be imposed for failure to perform response actions under the MCP.

Penalties and the response costs of DEP are considered a debt to the Commonwealth. Such debts may be recovered by attaching any monies that are owed to you by the Commonwealth (tax refunds, etc.) or by placing liens on real property owned by you in Massachusetts.

# Department of Environmental Protection

## Emergency Response Contacts

To report a release or threat of release of oil or hazardous materials during regular business hours, call the Emergency Response Team in the DEP Regional Office that serves the affected community (see below).



**DEP Western Region**  
436 Dwight Street  
Springfield, MA 01103

**413-784-1100**

Adams  
Agawam  
Alford  
Amherst  
Ashfield  
Becket  
Belchertown  
Bernardston  
Blandford  
Brimfield  
Buckland  
Charlemont  
Cheshire  
Chester  
Chesterfield  
Chicopee  
Clarksburg

Colrain  
Conway  
Cummington  
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Deerfield  
Easthampton  
East Longmeadow  
Egremont  
Erving  
Florida  
Gill  
Goshen  
Granby  
Granville  
Great Barrington  
Greenfield  
Hadley

Hampden  
Hancock  
Hatfield  
Hawley  
Heath  
Hinsdale  
Holland  
Holyoke  
Huntington  
Lanesborough  
Lee  
Lenox  
Leverett  
Leyden  
Longmeadow  
Ludlow  
Middlefield

Monroe  
Montague  
Monterey  
Montgomery  
Monson  
Mount Washington  
New Ashford  
New Marlborough  
New Salem  
North Adams  
Northampton  
Northfield  
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Southwick  
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Westfield  
Westhampton  
West Springfield  
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Whately  
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**DEP Central Region**  
627 Main Street  
Worcester, MA 01605

**508-792-7653**

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Athol  
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West Brookfield  
Westford  
Westminster  
Winchendon  
Worcester



**DEP Southeast Region**  
20 Riverside Drive  
Lakeville, MA 02347

**508-946-2850**

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Somerset  
Stoughton  
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Truro  
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Westport  
West Tisbury  
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**DEP Northeast Region**  
10 Commerce Way  
Woburn, MA 01801

**617-932-7681**

**617-932-7697**

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Merrimac  
Methuen  
Middleton  
Millis  
Milton  
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Newburyport  
Newton  
Norfolk  
North Andover  
North Reading  
Norwood  
Peabody

Quincy  
Randolph  
Reading  
Revere  
Rockport  
Rowley  
Salem  
Salisbury  
Saugus  
Seymour  
Somerville  
Stonham  
Sudbury  
Swampscott  
Tewksbury  
Topsfield

Wakefield  
Walpole  
Waltham  
Watertown  
Wayland  
Wellesley  
Wenham  
West Newbury  
Weston  
Westwood  
Weymouth  
Wilmington  
Winchester  
Winthrop  
Woburn

**Nights, Weekends and Holidays:**

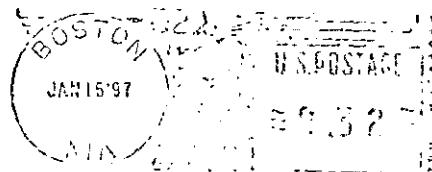


**Dial 617-292-5500**



Commonwealth of Massachusetts  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
Bureau of Waste Site Cleanup  
One Winter Street  
Boston, Massachusetts 02108

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ARGEO PAUL CELLUCCI  
Lt. Governor

TRUDY COXE  
Secretary

DAVID B. STRUHS  
Commissioner

WHITE CONSOLIDATED INDUSTRIES  
Attn: WARD SMITH, PRESIDENT  
15 ADAMS ST  
BURLINGTON, VT 44111-

*Returned  
to Sender*

January 8, 1997

RE: Publication of Tier I Disposal Site for Failure to Take Action  
Release Tracking Number: 2-0000111  
Site Information: ATF DAVIDSON  
1 MAIN ST, NORTHBRIDGE, MA

Dear Sir or Madam:

The purpose of this letter is to notify you that the Department of Environmental Protection (DEP) is preparing to publish a list of Tier I disposal sites, including "failure to take action" sites. The Tier I site list will include the above referenced property (Property) because either no response actions have been taken at the Property or response actions have not been conducted in compliance with applicable deadlines for conducting such actions. If appropriate actions are taken by March 14, 1997, the Property will not be included as a "failure to take action" site. If you are a potentially responsible party and take appropriate action you may also avoid other DEP enforcement.

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**The Site List**

In order to avoid publication of this Property on the Tier I, "Failure to Take Action" list, DEP must receive one of the following documents by March 14, 1997:

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- B) A Response Action Outcome (RAO) Statement prepared by an LSP in accordance with 310 CMR 40.1000; or
- C) A Downgradient Property Status (DPS) Submittal prepared by an LSP in accordance with 310 CMR 40.0180.

If the above referenced Property was reported to DEP before 10/1/93, the following documents may be submitted instead of A, B or C above:

- D) An LSP Evaluation Opinion (described in 310 CMR 40.0600) indicating that:
1. there has not been a reportable release at this site and no response actions are necessary;
  2. a reportable release has occurred but previous response actions sufficiently cleaned up the release to achieve a Class A or Class B Response Action Outcome (RAO);
  3. the site is adequately regulated by another program in accordance with the MCP at 310 CMR 40.0110; or
- E) A statement and supporting documentation in accordance with 310 CMR 40.0610(4) that a report was filed with the Department prior to October 1, 1993, which explicitly concluded that no further remedial actions were necessary.

#### Enforcement

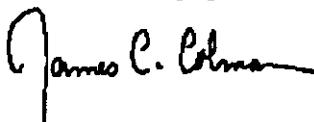
Regardless of the status of a property on the Tier I site list, responsible parties are required to take actions under MGL Chapter 21E and the MCP. Potentially responsible parties include current owners for any site, as well as past owners where hazardous materials have been released. Please consider carefully the enclosed attachment for information about potentially responsible parties. If you are a potentially responsible party you may be subject to certain enforcement actions for failure to take appropriate action as described above. The potential for enforcement actions may be avoided if you submit a written statement or notification certified under pains and penalties of perjury, to DEP by February 17, 1997 as follows:

- 1) A written statement that you do not have nor did you ever have a connection to the Property that makes you a potentially responsible party. Include any information you have regarding those currently connected with the Property;
- 2) A written notification pursuant to 310 CMR 40.0172 asserting and demonstrating that you are financially, legally or technically unable to perform the above response actions; or
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All submittals must be made to the Bureau of Waste Site Cleanup in the DEP Regional Office where the site is located (see attached map). Certain submittals, as indicated above, require you to employ a Licensed Site Professional (LSP) to provide the required information. LSP information and a list of LSPs can be obtained from the LSP Board of Registration at (617) 556-1091. Please note that if you do begin response actions, while you may avoid certain enforcement actions, you will be subject to Annual Compliance Assurance Fees for each year in which response actions have been or are conducted at this Property.

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Very truly yours,



James C. Colman, Assistant Commissioner  
Bureau of Waste Site Cleanup

Encl.: Attachment  
Regional Map

## **Attachment: Potentially Responsible Parties Under MGL Chapter 21E**

Under Massachusetts General Law (MGL) Chapter 21E, holds people responsible for ensuring that releases of oil and/or hazardous materials are cleaned up include current owners or operators of a site where a release of oil and/or hazardous materials has occurred, and any person who owned or operated a site at the time hazardous material was stored or disposed of. Potentially responsible parties also include persons who transported, disposed of, stored or treated hazardous material at a site from which there is or has been a release or threat of release of such material, or any persons who otherwise caused or are legally responsible for a release or threat of release of oil or hazardous material at a site.

Liability under Chapter 21E is "strict", meaning it is not based on fault, but solely on a person's status as an owner, operator, generator, transporter or disposer. It is also joint and several, meaning that a responsible party may be liable for all response action costs incurred at the site, regardless of the existence of any other liable parties. Please consult Section 5(a) of MGL Chapter 21E for the complete information regarding your potential liability.

If you are a potentially responsible party and fail to initiate actions required by MGL Chapter 21E and the Massachusetts Contingency Plan (MCP), you may be subject to administrative penalties for failing to conduct response actions in a timely manner. In addition, the Department is authorized by MGL c. 21E to have the work performed by its contractors. In this case, you may be held liable for up to three times DEP's costs for conducting response actions at a property should DEP intervene. By taking such actions yourself, you can avoid liability for response action costs incurred by the Department and its contractors in performing these actions, and any sanctions which may be imposed for failure to perform response actions under the MCP.

Penalties and the response costs of DEP are considered a debt to the Commonwealth. Such debts may be recovered by attaching any monies that are owed to you by the Commonwealth (tax refunds, etc.) or by placing liens on real property owned by you in Massachusetts.

# Department of Environmental Protection Emergency Response Contacts

To report a release or threat of release of oil or hazardous materials during regular business hours, call the Emergency Response Team in the DEP Regional Office that serves the affected community (see below).



**DEP Western Region**  
436 Dwight Street  
Springfield, MA 01103

**413-784-1100**

Adams  
Agawam  
Alford  
Amherst  
Ashfield  
Becket  
Belchertown  
Bernardston  
Blandford  
Brimfield  
Buckland  
Charlemont  
Cheshire  
Chester  
Chesterfield  
Chicopee  
Clarksburg

Colrain  
Conway  
Cummington  
Dalton  
Deerfield  
Easthampton  
East Longmeadow  
Egremont  
Erving  
Florida  
Gill  
Goshen  
Granby  
Granville  
Great Barrington  
Greenfield  
Hadley

Hampden  
Hancock  
Hartfield  
Hawley  
Heath  
Hinsdale  
Holland  
Holyoke  
Huntington  
Lanesborough  
Lee  
Lenox  
Leverett  
Leyden  
Longmeadow  
Ludlow  
Middlefield

Monroe  
Montague  
Monterey  
Montgomery  
Monson  
Mount Washington  
New Ashford  
New Marlborough  
New Salem  
North Adams  
Northampton  
Northfield  
Orange  
Otis  
Palmer  
Pelham  
Peru

Pittsfield  
Plainfield  
Richmond  
Rowe  
Russell  
Sandisfield  
Savoy  
Sheffield  
Shelburne  
Shutesbury  
Southampton  
South Hadley  
Southwick  
Springfield  
Stockbridge  
Sunderland  
Tolland  
Tyringham  
Wales  
Ware  
Warwick  
Washington  
Wendell  
Westfield  
Westhampton  
West Springfield  
West Stockbridge  
Whately  
Wilbraham  
Williamsburg  
Williamstown  
Windsor  
Worthington



**DEP Central Region**  
627 Main Street  
Worcester, MA 01605

**508-792-7653**

Action  
Ashburnham  
Ashby  
Athol  
Auburn  
Ayer  
Barre  
Bellingham  
Berlin  
Blackstone  
Bolton  
Boxborough  
Boylston  
Brookfield

Charlton  
Clinton  
Douglas  
Dudley  
Dunstable  
East Brookfield  
Fitchburg  
Gardner  
Grafton  
Groton  
Harvard  
Hardwick  
Holden  
Hopedale

Hopkinton  
Hubbardston  
Hudson  
Holliston  
Lancaster  
Leicester  
Leominster  
Littleton  
Lunenburg  
Marlborough  
Maynard  
Medway  
Mendon  
Milford

Millbury  
Millville  
New Braintree  
Northborough  
Northbridge  
North Brookfield  
Oakham  
Oxford  
Paxton  
Pepperell  
Petersham  
Phillipston  
Princeton  
Royalston

Rutland  
Shirley  
Shrewsbury  
Southborough  
Southbridge  
Spencer  
Sterling  
Stowe  
Sturbridge  
Sutton  
Templeton  
Townsend  
Tyngsborough  
Upton

Uxbridge  
Warren  
Webster  
Westborough  
West Boylston  
West Brookfield  
Westford  
Westminster  
Winchendon  
Worcester



**DEP Southeast Region**  
20 Riverside Drive  
Lakeville, MA 02347

**508-946-2850**

Abington  
Acushnet  
Attleboro  
Avon  
Barnstable  
Berkley  
Bourne  
Brewster  
Bridgewater  
Brockton  
Carver  
Chatham  
Chilmark

Dartmouth  
Dennis  
Dighton  
Duxbury  
Eastham  
East Bridgewater  
Easton  
Edgartown  
Fairhaven  
Fall River  
Falmouth  
Foxborough  
Franklin

Freetown  
Gay Head  
Gosnold  
Halifax  
Hanover  
Hanson  
Harwich  
Kingston  
Lakeville  
Mansfield  
Marion  
Marshfield  
Mashpee

Mattapoisett  
Middleborough  
Nantucket  
New Bedford  
North Attleborough  
Norton  
Norwell  
Oak Bluffs  
Orleans  
Pembroke  
Plainville  
Plymouth  
Plympton

Provincetown  
Raynham  
Rehoboth  
Rochester  
Rockland  
Sandwich  
Scituate  
Seekonk  
Sharon  
Somerset  
Stoughton  
Swansea  
Taunton

Tisbury  
Truro  
Wareham  
Welfleet  
West Bridgewater  
Westport  
West Tisbury  
Whitman  
Wrentham  
Yarmouth



**DEP Northeast Region**  
10 Commerce Way  
Woburn, MA 01801

**617-932-7681**  
**617-932-7697**

Amesbury  
Andover  
Arlington  
Ashland  
Bedford  
Belmont  
Beverly  
Billerica  
Boston  
Boxford  
Braintree  
Brookline  
Burlington  
Cambridge  
Canton  
Carlsle

Chelmsford  
Chelsea  
Cohasset  
Concord  
Danvers  
Dedham  
Dover  
Dracut  
Essex  
Everett  
Frammingham  
Georgetown  
Gloucester  
Groveland  
Hamilton  
Haverhill

Hingham  
Holbrook  
Hull  
Ipswich  
Lawrence  
Lexington  
Lincoln  
Lowell  
Lynn  
Lynnfield  
Malden  
Manchester-By-The-Sea  
Marblehead  
Medfield  
Medford  
Melrose

Merrimac  
Methuen  
Middleton  
Millis  
Milton  
Nahant  
Natick  
Needham  
Newbury  
Newburyport  
Newton  
Norfolk  
North Andover  
North Reading  
Norwood  
Peabody

Quincy  
Randolph  
Reading  
Revere  
Rockport  
Rowley  
Salem  
Saugus  
Sherborn  
Somerville  
Stonham  
Sudbury  
Swampscott  
Tewksbury  
Topsfield

Wakefield  
Walpole  
Waltham  
Watertown  
Wayland  
Wellesley  
Wenham  
West Newbury  
Weston  
Westwood  
Weymouth  
Wilmington  
Winchester  
Winthrop  
Woburn

**Nights, Weekends and Holidays:**



**Dial 617-292-5500**

MEMORANDUM TO FILE

FROM: Molly Elder, BWSC Enforcement Coordinator *mfe*  
DATE: April 23, 1997  
SUBJECT: TIER 1B DEFAULT, FAILURE TO TAKE ACTION

SITE # or RTN: 2 0111

As a result of the "Failure to Take Action Letter" dated January 8, 1997 sent from the Boston office to the PRP/s (listed in the DEP database at the time) for this site, and any subsequent response from PRP/s, the following recommendation concerning listing as a Tier 1B is made:

X This site should NOT be listed as Tier 1B by Default. Although it was out of compliance, an adequate action and/or submittal was rec'd by the 3/14/97 deadline.

A This site should NOT have rec'd the Jan 8th letter because compliance was achieved prior to the mailing of the letter.

    This site should be LISTED as a TIER 1B by Default. Although, some correspondence was rec'd, it was not the necessary submittal for compliance to be achieved.

    This site should be LISTED as TIER 1B by Default. No response to the Jan 8th was rec'd.

Additional Notes:

*TC II rec'd 3/12/97 (in<sup>admin</sup>complete) - to be rectified by 4/7.*

# FRONT END/SITES DATABASE CHANGE FORM

(completed by BWSC staff)

RTN #/SITE ID #: 2- 0111

Related #: 2-

RTN/SITE NAME OR ADDRESS: 1 Main Str. Northbridge (ATF Davidson)  
STAFF SUBMITTING CHANGE: Molly Elder DATE: 3-31-97  
AUTHORIZATION (Branch or Sect. Chief/RE):

## REASONING FOR CHANGE (Not Optional):

One or more letters (Jan 8<sup>th</sup> Failure To Take Action letter) was "returned to sender" for this RTN. The legal intern called town assessors office to obtain name &/or address of current owner: current owner is Sidney Corvick

if email or RLFA, is there a copy attached? (Y) or N

## CHANGE/ADD

① FIELD: Whitinsville Realty FROM: Main Str (Whitinsville) TO: 1 Main Str  
PRP: Sidney Corvick

② PRP address invalid: Philip Whitney → returned to sender  
Northbridge MA

③ PRP address invalid: White Consolidated → returned to sender  
Burlington VT

## FEES for transition sites (must attach copy of email)

TYPE	Date cleared by Boston	SITE ID #



COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
ONE WINTER STREET, BOSTON, MA 02108 617-292-5500

WILLIAM F. WELD  
Governor

ARGEO PAUL CELLUCCI  
Lt. Governor

TRUDY COXE  
Secretary

DAVID B. STRUHS  
Commissioner

WHITINSVILLE REALTY TRUST  
Attn: SIDNEY COVICH,  
MAIN ST  
WHITINSVILLE, 01588-

January 8, 1997

RE: Publication of Tier I Disposal Site for Failure to Take Action  
Release Tracking Number: 2-0000111  
Site Information: ATF DAVIDSON  
1 MAIN ST, NORTHBRIDGE, MA

Dear Sir or Madam:

The purpose of this letter is to notify you that the Department of Environmental Protection (DEP) is preparing to publish a list of Tier I disposal sites, including "failure to take action" sites. The Tier I site list will include the above referenced property (Property) because either no response actions have been taken at the Property or response actions have not been conducted in compliance with applicable deadlines for conducting such actions. If appropriate actions are taken by March 14, 1997, the Property will not be included as a "failure to take action" site. If you are a potentially responsible party and take appropriate action you may also avoid other DEP enforcement.

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The Site List

In order to avoid publication of this Property on the Tier I, "Failure to Take Action" list, DEP must receive one of the following documents by March 14, 1997:

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If the above referenced Property was reported to DEP before 10/1/93, the following documents may be submitted instead of A, B or C above:



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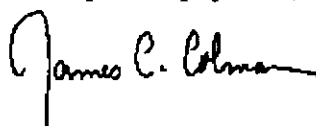
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Very truly yours,



James C. Colman, Assistant Commissioner  
Bureau of Waste Site Cleanup

Encl.: Attachment  
Regional Map

## **Attachment: Potentially Responsible Parties Under MGL Chapter 21E**

Under Massachusetts General Law (MGL) Chapter 21E, holds people responsible for ensuring that releases of oil and/or hazardous materials are cleaned up include current owners or operators of a site where a release of oil and/or hazardous materials has occurred, and any person who owned or operated a site at the time hazardous material was stored or disposed of. Potentially responsible parties also include persons who transported, disposed of, stored or treated hazardous material at a site from which there is or has been a release or threat of release of such material, or any persons who otherwise caused or are legally responsible for a release or threat of release of oil or hazardous material at a site.

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Commissioner

ATF DAVIDSON  
Attn: PHILIP WHITNEY,  
MAIN ST.  
NORTHBRIDGE, MA 01534

January 8, 1997

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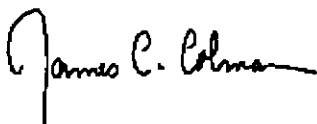
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Bureau of Waste Site Cleanup

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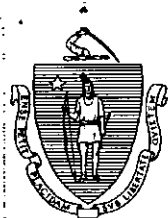
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If you are a potentially responsible party and fail to initiate actions required by MGL Chapter 21E and the Massachusetts Contingency Plan (MCP), you may be subject to administrative penalties for failing to conduct response actions in a timely manner. In addition, the Department is authorized by MGL c. 21E to have the work performed by its contractors. In this case, you may be held liable for up to three times DEP's costs for conducting response actions at a property should DEP intervene. By taking such actions yourself, you can avoid liability for response action costs incurred by the Department and its contractors in performing these actions, and any sanctions which may be imposed for failure to perform response actions under the MCP.

Penalties and the response costs of DEP are considered a debt to the Commonwealth. Such debts may be recovered by attaching any monies that are owed to you by the Commonwealth (tax refunds, etc.) or by placing liens on real property owned by you in Massachusetts.



COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ONE WINTER STREET, BOSTON, MA 02108 617-292-5500

WILLIAM F. WELD  
Governor

ARGEO PAUL CELLUCCI  
Lt. Governor

TRUDY COXE  
Secretary

DAVID B. STRUHS  
Commissioner

**WHITE CONSOLIDATED INDUSTRIES**

**Attn: WARD SMITH, PRESIDENT**  
**15 ADAMS ST**  
**BURLINGTON, VT 44111-**

January 8, 1997

RE: Publication of Tier I Disposal Site for Failure to Take Action  
Release Tracking Number: 2-0000111  
Site Information: **ATF DAVIDSON**  
**1 MAIN ST, NORTHBRIDGE, MA**

**Dear Sir or Madam:**

The purpose of this letter is to notify you that the Department of Environmental Protection (DEP) is preparing to publish a list of Tier I disposal sites, including "failure to take action" sites. The Tier I site list will include the above referenced property (Property) because either no response actions have been taken at the Property or response actions have not been conducted in compliance with applicable deadlines for conducting such actions. **If appropriate actions are taken by March 14, 1997, the Property will not be included as a "failure to take action" site. If you are a potentially responsible party and take appropriate action you may also avoid other DEP enforcement.**

Information available to the Department indicates that a release of oil and/or hazardous materials may have occurred at the Property. Chapter 21E of the Massachusetts General Laws and the Massachusetts Contingency Plan (the "MCP") govern the work required for assessment and cleanup of releases of oil and/or hazardous materials. Our files indicate that required assessment and cleanup activities at the Property have either not been started or have not been conducted in compliance with response action deadlines. The identification of releases and the initiation of response actions is critical to protecting public health and the environment. Therefore, in addition to publishing a list of Tier I sites, DEP will initiate enforcement against potentially responsible parties for those sites in noncompliance with the provisions of the law.

**The Site List**

In order to avoid publication of this Property on the Tier I, "Failure to Take Action" list, DEP must receive one of the following documents by March 14, 1997:

- A) A Tier Classification Submittal prepared by a Licensed Site Professional (LSP) in accordance with the MCP at 310 CMR 40.0500, and a Tier I Permit application if applicable;
- B) A Response Action Outcome (RAO) Statement prepared by an LSP in accordance with 310 CMR 40.1000; or
- C) A Downgradient Property Status (DPS) Submittal prepared by an LSP in accordance with 310 CMR 40.0180.

If the above referenced Property was reported to DEP before 10/1/93, the following documents may be submitted instead of A, B or C above:

1. there has not been a reportable release at this site and no response actions are necessary;
  2. a reportable release has occurred but previous response actions sufficiently cleaned up the release to achieve a Class A or Class B Response Action Outcome (RAO);
  3. the site is adequately regulated by another program in accordance with the MCP at 310 CMR 40.0110; or
- E) A statement and supporting documentation in accordance with 310 CMR 40.0610(4) that a report was filed with the Department prior to October 1, 1993, which explicitly concluded that no further remedial actions were necessary.

#### **Enforcement**

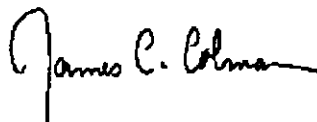
Regardless of the status of a property on the Tier I site list, responsible parties are required to take actions under MGL Chapter 21E and the MCP. Potentially responsible parties include current owners for any site, as well as past owners where hazardous materials have been released. Please consider carefully the enclosed attachment for information about potentially responsible parties. If you are a potentially responsible party you may be subject to certain enforcement actions for failure to take appropriate action as described above. The potential for enforcement actions may be avoided if you submit a **written** statement or notification certified under pains and penalties of perjury, to DEP by February 17, 1997 as follows:

- 1) A **written** statement that you do not have nor did you ever have a connection to the Property that makes you a potentially responsible party. Include any information you have regarding those currently connected with the Property;
- 2) A **written** notification pursuant to 310 CMR 40.0172 asserting and demonstrating that you are financially, legally or technically unable to perform the above response actions; or
- 3) A **written** statement describing all response actions to date and a schedule for resuming response actions at the Property.

All submittals must be made to the Bureau of Waste Site Cleanup in the DEP Regional Office where the site is located (see attached map). Certain submittals, as indicated above, require you to employ a Licensed Site Professional (LSP) to provide the required information. LSP information and a list of LSPs can be obtained from the LSP Board of Registration at (617) 556-1091. Please note that if you do begin response actions, while you may avoid certain enforcement actions, you will be subject to Annual Compliance Assurance Fees for each year in which response actions have been or are conducted at this Property.

A copy of the MCP may be obtained from the Statehouse Bookstore in Boston by calling (617) 727-2834 or in Springfield by calling (413) 784-1376. If you have other questions about the requirements for this Property described above, please call the MCP Help Line at (617) 338-2255 from the 617 area code and outside Massachusetts or (800) 462-0444 from the 413 and 508 area codes.

Very truly yours,



James C. Colman, Assistant Commissioner  
Bureau of Waste Site Cleanup

Encl.: Attachment  
Regional Map

## **Attachment: Potentially Responsible Parties Under MGL Chapter 21E**

Under Massachusetts General Law (MGL) Chapter 21E, holds people responsible for ensuring that releases of oil and/or hazardous materials are cleaned up include current owners or operators of a site where a release of oil and/or hazardous materials has occurred, and any person who owned or operated a site at the time hazardous material was stored or disposed of. Potentially responsible parties also include persons who transported, disposed of, stored or treated hazardous material at a site from which there is or has been a release or threat of release of such material, or any persons who otherwise caused or are legally responsible for a release or threat of release of oil or hazardous material at a site.

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If you are a potentially responsible party and fail to initiate actions required by MGL Chapter 21E and the Massachusetts Contingency Plan (MCP), you may be subject to administrative penalties for failing to conduct response actions in a timely manner. In addition, the Department is authorized by MGL c. 21E to have the work performed by its contractors. In this case, you may be held liable for up to three times DEP's costs for conducting response actions at a property should DEP intervene. By taking such actions yourself, you can avoid liability for response action costs incurred by the Department and its contractors in performing these actions, and any sanctions which may be imposed for failure to perform response actions under the MCP.

Penalties and the response costs of DEP are considered a debt to the Commonwealth. Such debts may be recovered by attaching any monies that are owed to you by the Commonwealth (tax refunds, etc.) or by placing liens on real property owned by you in Massachusetts.



SCANNED

WHITE CONSOLIDATED INDUSTRIES, INC.

CLEVELAND, OHIO 44111

DANIEL MARQUES, P. E.  
ENGINEER  
ENERGY & ENVIRONMENTAL AFFAIRS

December 18, 1985

Ms. Susan Cordman  
Division of Hazardous Waste  
The Commonwealth of Massachusetts  
Department of Environment Quality Engineering  
Central Region  
75 Grove Street, Box 13  
Worcester, Massachusetts 01605

Dear Susan:

The following is a description of the system to be implemented on the Covitch property, located in Whitinsville, Massachusetts, to remove oil from the area which is outlined in our Report (White Consolidated Industries, Inc.) Appendix "C", issued to your department in October of 1985, identified as "The Monitoring Well Installation and Soil and Water Quality Analysis - Sidney Covitch Properties - Whitinsville, Massachusetts".

The proposed system includes an interceptor trench approximately 130 to 140 feet long and 15 feet deep to intercept flow of oil from under and around Building 9 into the Raceway. This trench will be filled with crushed stone or other suitable drainage material. The downstream side of the trench will be lined with an impermeable liner at the proper depth. (Refer to Page 3 and Appendix "C" of the Report in your possession, dated September of 1985 for exact location.)

One recovery well will be located near the trench and outfitted with a Petropurge System to create a "cone depression", separate the oil, and pump it into a recovery tank located at a site provided adjacent to Building 9, and the water will be put through an Air Stripping System which will discharge water at a rate of approximately 5 to 10 gallons per minutes during the early life of the project and diminishing with time. According to past performance of the system proposed, the effluent (water) being discharged should contain less than 100 ppb of volatile organics. The entire system efficiency is approximately 99%.

RECEIVED

DEC 19 1985

Div. Solid/Hazardous Waste

Sketches of the Petropurge and Airpurge System is enclosed for your information. Based on the system described, it is requested that the system and the discharge of water into the Northbridge Sewer Department will be approved on its entirety.

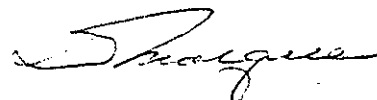
Monitoring and maintenance of the system will be performed by NEPCCO, 29 Wall Street, Foxboro, Massachusetts, 02035 - 617/543-8458 - Paul Guena.

As agreed at the November meeting held at your office, the deficiency outlined in Appendix "C" of the Report is the only remaining item in the Report which White Consolidated Industries is liable for. The rest of the property sold to Sidney Covitch is free and clear of all hazardous waste in accordance with the hydrogeologic study site assessment conducted by Caswell, Eichler and Hill, Inc., Portsmouth, New Hampshire submitted to your department in November of 1985.

As of November 1985 any hazardous waste, ground or water contamination, except for the contamination exhibited in Appendix "C" of the Hydrogeologic Assessment mentioned above, will be the sole responsibility of The Shop - Sidney Covitch.

Your utmost attention to this memorandum will be extremely appreciated. If you have any questions, do not hesitate to contact the writer at 216/252-3700, Extension 404.

Very truly yours,



Daniel Marques

/ecc  
Attachment

cc: K. E. Ware  
D. S. Mattis  
W. G. Jacobs  
J. L. Calhoun

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DEC 19 1985

Div. Solid/Hazardous Waste

DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING  
CENTRAL REGION OFFICE  
75 GROVE STREET, WORCESTER, MASSACHUSETTS

ATTENDANCE SHEET

Meeting Purpose: Covich Property, Northbridge, MA

DATE: 12/16/85

Meeting Location: DEQE CRO, Worcester, MA

<u>NAME</u>	<u>ORGANIZATION</u>	<u>ADDRESS</u>	<u>TELEPHONE #</u>
1. <u>MATT EICHLER</u>	<u>CASWELL EICHLER &amp; HILL</u>	<u>P.O. Box 4696 NEWINGTON, N.H.</u>	<u>603-431-4899</u>
2. <u>DANIEL MARQUES</u>	<u>WHITE CONSOLIDATED IND</u>	<u>CLEVELAND</u>	<u>216-252-3700</u>
3. <u>Susan Corderman</u>	<u>DEQE-DSHW</u>	<u>75 Grove St. Worcester</u>	<u>792-7653</u>
4. <u>JEFFREY G. ANDREWS</u>	<u>DEQE - DWPC</u>	<u>" "</u>	<u>792-7650</u>
5. <u>John Desmond</u>	<u>DEQE</u>	<u>" "</u>	<u>" "</u>
6.			
7.			
8.			
9.			
10.			
11.			
12.			
13.			
14.			
15.			



Caswell, Eichler and Hill, Inc.

GEOLOGY HYDROLOGY GEOPHYSICS

P.O. Box 4696

Portsmouth, NH 03801

TEL. (603) 431-4899

October 29, 1985.

White Consolidated Industries, Inc.  
11770 Berea Road  
Cleveland, Ohio 44111

Attn: Mr. Dan Marques, P.E.

Re: 10-24-85 Meeting at DEQE Offices, Worcester, MA

Dear Dan:

Per the agreements arrived at during our meeting with DEQE, CEH had been given five action items to pursue. They were:

1. Research the availability of a comprehensive hazardous materials handling text.
2. Instruct RAI to evaluate the ten highest peaks of organic chemicals present (other than those chemical compounds included in the EPA 624 analysis already completed) in each of the Arcade water samples (M-1 through M-8), the three auger probe soil samples (AP-104, S-4; AP-105, S-1; AP-105, S-3) taken from the Building 9/Raceway area, and the Covitch property water samples (MC-1, 2, 3, 7, 10, 11, 12, 13, 14 and 15).
3. Select soil samples taken during monitoring well construction from MC-7 and MC-10, and have them tested for barium, arsenic and zinc.
4. Determine a quarterly sampling schedule for the Arcade monitoring wells to include volatile organic compounds (EPA 624, and others to be determined by outcome of #2 above), barium, arsenic, zinc, pH, conductivity and temperature.
5. Take additional benthic samples from the Mumford River, and conduct an EP Toxicity Test on each sample.

Mr. Dan Marques, P.E.  
October 29, 1985  
Page Two

To date, the following actions have been taken on the above five items:

1. The hazardous materials text:

TITLE: MATERIAL SAFETY DATA SHEETS COLLECTION (2 Vols.)

ORDER: GENIUM PUBLISHERS  
1145 CATALYN STREET  
SCHENECTADY, NY 12303-1836

2. All tasks discussed have been begun. A preliminary progress report should be forthcoming in several weeks.
3. The soil samples were delivered to RAI, and the data should be available in several weeks.
4. The quarterly sampling schedule is as follows:  
  
1st November 14, 1985  
2nd February 12, 1986  
3rd May 14, 1986  
4th August 13, 1986
5. CEH and RAI will be collecting the benthic samples on November 14, 1985. Laboratory data should be completed several weeks thereafter.

Several other WCI action items were discussed during our meeting. To summarize our notes:

1. Building 9/Raceway area

- a. Prepare a work plan to construct and operate a collection trench/oil separator along the raceway. This plan must include a good reason why WCI is not simply removing all of the contaminated soil and ground water, and transporting it to a secure landfill or other disposal facility.
- b. Obtain a ground water discharge permit for the recycling of water that has been separated from the oil. Forms are available from Susan Corderman.
- c. The work plan should discuss options for determining the level of oil contamination on the south side of the raceway (monitoring well, deep test pit), and how clean up or containment will be handled should problem levels exist. The work plan should also discuss long term monitoring of the south side of the raceway. The placement of a monitoring well or two should suffice.
- d. The work plan should state that once construction of the trench/separator is completed, the raceway will be once again thoroughly cleaned.

Mr. Dan Marques, P.E.  
October 29, 1985  
Page Three

2. River Bottom

- a. Have WCI legal personnel establish who owns the Mumford River bottom.
- b. If WCI or ATF/D does not own the river bottom, have WCI legal submit a brief to DEQE so stating, and denying responsibility for the presence or clean-up of chromium known to be present in the benthic sediments.
- c. Check meaning of Traverse Line across the Mumford River that is labeled White Consolidated Industries on FIGURE 2, PLATE 1 of the Covitch property report. Also check to see if Mr. Covitch owns any of the river bottom on the other side of the traverse should it be determined that WCI or ATF/D owns the river bottom to that point. Mr. Covitch may be a slightly different case in that he owns the dam which creates Whitin Pond.

Should you have any questions regarding the content of this letter, or should you need any assistance with the Building 9/Raceway work plan, please call.

Very truly yours,  
CASWELL, EICHLER & HILL, INC.

Matthew F. Eichler III  
Principal

MFE/SKK

*Covich*

WHITE CONSOLIDATED INDUSTRIES, INC.

CLEVELAND, OHIO 44111

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JUL 24 1985

EXECUTIVE OFFICES

RICHARD E. HILL, P. E.  
ENVIRONMENTAL ENGINEER

Div. Solid/Hazardous Waste

July 22, 1985

Ms. Susan Corderman  
Division of Hazardous Waste  
The Commonwealth of Massachusetts  
Department of Environmental Quality Engineering  
Central Region  
75 Grove Street, Box 13  
Worcester, Massachusetts 01605

Dear Susan:

This is to memorialize the discussion at our meeting held in your office on July 17, 1985. John Desmond and Matt Eichler were also in attendance.

We agreed to sample the location #1 of the oil pit area again. This time we would perform an EP toxicity test (metals only), total metals and a metals leachate with pH set at the value found in the ground water in that area. Further, we will add metals analysis to soil samples taken on the Covich property hydrogeological study. PCB results will be reported to you from the oil pit sampling and analyses efforts of Rhode Island Analytical Laboratories (attached) as they become available. Finally phenol testing will be performed on Covich wells Numbers 7 and 14.

We discussed the remediation of the oil contamination adjacent to building #9 in some length. Dan Marques is soliciting quotes from Clean Harbors, Jetline and O&H Materials for both a total removal of contaminated soil and oil, and installation of an oil purging system. Discussion touched on the pros and cons of each approach.

The oil purging system, which is envisioned to consist of a collection trench or field tile that would feed a sump containing an oil-water separator of some form. The oil would be collected and periodically removed. The water would be replaced upgradient of the oil pocket in order to effect a recycle purging system. The area would be paved and sealed to prevent the introduction of additional water resulting from precipitation.

Ms. Susan Corderman  
Division of Hazardous Waste  
The Commonwealth of Massachusetts

This approach is favored by relatively low cost and low risk. Permitting difficulties and operating attendance during the several months required for complete purging militate against this approach.

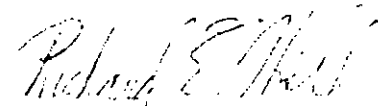
The total removal option is favored by the fact that it would be over and done with relatively soon (assuming the facility that receives this material doesn't become a Superfund site in its own right). Operating against the total removal option are both its anticipated greater cost and greater risk. The risk is primarily the result of the effect of removal of large quantities of soil on nearby building foundations and the many underground utilities in the area.

We agreed that both more information was needed before a decision could be made, and that WCI was taking prudent and prompt measures to acquire that information. John and you indicated that your agency probably could be comfortable with either approach.

You gave us the necessary paperwork for a groundwater discharge permit, which is necessary for the oil purging option. You also gave us the written approval for the Covich site assessment plan we had earlier submitted. Further, you reminded us that a health and safety plan was necessary for the activities necessary to correct the oil contamination problem. We indicated that all the well drilling efforts on both the landfill and Covich property was complete, and that sample collection would be undertaken shortly.

I trust that this is an accurate summary of our meeting.

Sincerely,



Richard E. Hill

/ecc  
Attachment

cc: S. Covich  
J. Desmond  
M. F. Eichler  
D. Marques



## MEMORANDUM

TO: File

THRU: Susan Corderman *AAC*

FROM: Alan Weiss *AW*

DATE: July 22, 1985

SUBJECT: ATF Davidson, Whitinsville, MA

Commencing the week of Monday, July 8, 1985, CEH began the field sampling program at the Arcade and Covich properties in Whitinsville, Massachusetts.

At 1:30 p.m. on July 8, 1985, A. Weiss and S. Corderman (DEQE) met with Dan Marcus (ATF-D), Matt Eichler and Richard Hill (CEH) at the Arcade property. After observing the drilling operation on the Arcade property, and discussing: (1) the (flyash) material encountered in the boreholes, and (2) the monitoring well construction and locations the field meeting adjourned.

A meeting to discuss the results of metals analysis from samples collected behind building #9 at the Covich property was held after the above mentioned field visit, DEQE agreed that the Covich Site work should begin.

Subsequent site visits were made on Tuesday, Thursday and Friday of that week.

By Tuesday all wells on the Arcade property completed in the Flyash landfill had been constructed, and were then developed on Wednesday. On Thursday, wells 6, 8, 9 were abandoned due to shallow refusal. Wells 3 and 5 were set and encountered fill to 7' and native M-C Sand to 10' (W.T.@ 7.5'). Well #4 was also abandoned to refusal at 5 feet, with water at 4.5 feet. Wells 1,2,7 and 10 were set in M-C sand 0-7' and sandy till 7' - 12'. The well depths are 9.5' - 12' and encountered water at (5'-8.75').

*should be "Covitch" R. Adler 11/28/85*

On Monday, July 15, 1985, Auger probes in the tail race area behind building #9 were made. Oily smelling fill was encountered in all four holes (AP-101, 102,103,104) in fill to 7'-8' with F. - M. sand and F. sandy till found at 8' - 12'. The most odorous samples were near the water table (7'-8', HNU 7-12 ppm). Water in the trench near building 9 was at 7', while water in the race was at 10'.

June 1985	July 1985	August 1985	September 1985
S M T W T F S	S M T W T F S	S M T W T F S	S M T W T F S
2 3 4 5 6 7 8	1 2 3 4 5 6	4 5 6 7 8 9 10	1 2 3 4 5 6 7
9 10 11 12 13 14 15	7 8 9 10 11 12 13	11 12 13 14 15 16 17	8 9 10 11 12 13 14
16 17 18 19 20 21 22	14 15 16 17 18 19 20	18 19 20 21 22 23 24	15 16 17 18 19 20 21
23 24 25 26 27 28 29	21 22 23 24 25 26 27	25 26 27 28 29 30 31	22 23 24 25 26 27 28
	28 29 30 31		29 30

Monday July 15 196/169

8 AP-101: refusal @ 7' 11' gray blk fill. 1  
 AP-102 8-10' oil sat'd m. & sand, g. fill. 7-12  
 9 WT: 7.5' 10'-12' less E-M silt 4.5-7 2  
 12'-14' F sand - silt 3-7  
 10 AP-103 refusal @ 8.75' blk. fill. 3  
 11 AP-104 8'-10' odororous blk stg  
 10'-12' odorous gray blk stg, 11' gray till 4  
 - red water from 10'-14'  
 12 - trend WT @ 7.5' ~~12'-13.5'~~ evening  
 12'-13.5' ~~12'-13.5'~~ odor gray till.

Tuesday July 16 197/168

8 EPA Sampling Course 1  
 Lexington  
 9 2  
 10 3  
 11 4  
 12 5  
 evening

Wednesday July 17 198/167

8 EPA Sampling Course 1  
 9 2  
 10 3  
 11 4  
 12 5  
 evening

MONDAY JULY 15  
 thru  
 SUNDAY JULY 21

Thursday July 18 199/166

EPA Sampling Course

Friday July 19 200/165

Saturday July 20 201/164

Sunday July 21 202/163

June 1985	July 1985	August 1985	September 1985
S M T W T F S	S M T W T F S	S M T W T F S	S M T W T F S
2 3 4 5 6 7 8	1 2 3 4 5 6	1 2 3	1 2 3 4 5 6 7
9 10 11 12 13 14 15	7 8 9 10 11 12 13	4 5 6 7 8 9 10	8 9 10 11 12 13 14
16 17 18 19 20 21 22	14 15 16 17 18 19 20	11 12 13 14 15 16 17	15 16 17 18 19 20 21
23 24 25 26 27 28 29	21 22 23 24 25 26 27	18 19 20 21 22 23 24	22 23 24 25 26 27 28
	28 29 30 31	25 26 27 28 29 30 31	29 30

Monday July 8 189/176

- 8 - m. Conway, GZA - ATE Davidson  
called, 555 main Hudson  
9 - response to F. Patten Field visit, Eichler  
drafted, site needs Hill, Marcus, Niel for  
10 Source ID, remed, Sump. couch present.

evening

Tuesday July 9 190/175

- 8 - 555 main - ZIE ATE Davidson field  
WZNOIZ, Draft. visit.

completed Arcade wells

evening

Wednesday July 10 191/174

developed wells on couch

evening

MONDAY JULY 8  
thru  
SUNDAY JULY 14

m. Couch  
m. Arcade

Thursday July 11 192/173

- 1 8 ATE - Davidson Stafford St. Joe Dicarlo  
2 9 9-8 - refusal Now it. Charleston,  
3 10 #6 - inaccessable  
4 11 5 AB - 7'6" .25' water  
5 12  
evening

Friday July 12 193/172

- 1 8 #4 - refusal @ 5' w.T. @ 4.5  
2 47 m-c. sand w/ weathered asphalt. set @ 12'  
3 9 m-c. to 10.5, 10.5 + 5, m-c, gravelly till. NFE @ 9'  
4 10 #10  
5 11 #11 1, fill asphalt, = c sd. p-8', 8'-10' till, w.T. @ 5.5'  
6 12 #12 2 0'-7' fill m-snd, 7'-9.5' till m-c.s.g. set @ 9.5'

evening

Saturday July 13 194/171

Sunday July 14 195/170

CAPE  
COD

Discussion on Pit

7/8/85 meeting

w/ ATFD, CEH, DEQE

- concrete the fails race way

- these numbers do not send up a red flag  
to stop activities

- Anxious to start immediately

- Dan will bring and phone  
rest of sample results we will  
then form letter w/ J.D.'s  
approval.

meeting

12 soil samples

Pit

ppm (@ Total Hg)

#1 3' 0.14

@ 3' Test Pit

oil < 0.05

#2 3' 0.14

#

~~water~~

~~oil~~

#3 4' 0.28

Water phase < 0.0010

#4 5' 0.24

#5 4' 0.34

~~Tail Race~~

#6 3' 0.34

Tail Race: 0.0068 (liquid)

#7 2' ~~0.1~~ \*

#8 5' 1.70

#9 4' 0.52

#10 2' 0.30

#11 5' 0.20

#12 5' 1.3 \*

\* - rechecking

WHITE CONSOLIDATED INDUSTRIES, INC.  
CLEVELAND, OHIO 44111

EXECUTIVE OFFICES

RICHARD E. HILL, P. E.  
ENVIRONMENTAL ENGINEER

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JUL 3 1985

Div. Solid/Hazardous Waste

July 1, 1985

VIA CERTIFIED MAIL

Ms. Susan Corderman  
Division of Hazardous Waste  
The Commonwealth of Massachusetts  
Department of Environmental Quality Engineering  
Central Region  
75 Grove Street, Box 13  
Worcester, Massachusetts 01605

Dear Susan:

Enclosed you will find a site assessment program  
for the Sidney Covich property in Whitinsville.

I trust this reaches you in good time so that we  
may discuss it at our July 8th meeting.

Very truly yours,

  
Richard E. Hill

/ecc  
Attachment

cc: S. Covich  
D. Marques

WHITE CONSOLIDATED INDUSTRIES, INC.

CLEVELAND, OHIO 44111

RECEIVED

JUN 14 1985

EXECUTIVE OFFICES

RICHARD E. HILL, P.E.  
ENVIRONMENTAL ENGINEER

Div. Solid/Hazardous Waste

June 13, 1985

VIA EMERY OVERNIGHT MAIL

Ms. Susan Corderman  
Division of Hazardous Waste  
The Commonwealth of Massachusetts  
Department of Environmental Quality Engineering  
Central Region  
75 Grove Street, Box 13  
Worcester, Massachusetts 01605

Dear Susan:

White Consolidated Industries, Inc. submits for your review and approval, a plan for the containment and removal of oil in the area of building #9 of the Sidney Covich property.

With respect to mercury contamination, Dan Marques will deliver the results of metal analyses to your office on June 17, 1985. Your prompt review of the sampling results and any recommendations for further sampling will allow us to have these samples collected on Wednesday, June 19, 1985.

We anticipate being able to propose an overall site evaluation plan of the Covich property by July 8, 1985.

After you have reviewed this please call me at 216/252-3700.

Very truly yours,



Richard E. Hill

/ecc

cc: D. Marques  
M. F. Eichler  
S. Covich

WHITE CONSOLIDATED INDUSTRIES, INC.

CLEVELAND, OHIO 44111

RECEIVED

JUN 14 1985

EXECUTIVE OFFICES

RICHARD E. HILL, P. E.  
ENVIRONMENTAL ENGINEER

Div. Solid/Hazardous Waste

June 13, 1985

VIA EMERY OVERNIGHT MAIL

Ms. Susan Corderman  
Division of Hazardous Waste  
The Commonwealth of Massachusetts  
Department of Environmental Quality Engineering  
Central Region  
75 Grove Street, Box 13  
Worcester, Massachusetts 01605

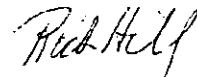
Dear Susan:

With respect to our proposal dated May 17, 1985 relative to hydrogeological evaluation of the landfill, you raised certain questions which we believe to have been satisfactorily answered by Matthew Eichler's letter to you of June 3, 1985 (copy attached).

This is to confirm our understanding that our plans are approved by your agency. This being the case, the work is scheduled to commence on July 8, 1985.

I would appreciate it if you could meet with me at the landfill site at 1:30 p.m. on July 8th, 1985 to review the status on all projects of our mutual interest.

Very truly yours,



Richard E. Hill

/ecc  
Attachment

cc: D. Marques  
M. F. Eichler



# CEH Caswell, Eichler and Hill, Inc.

GEOLOGY HYDROLOGY GEOPHYSICS

P.O. Box 4696  
Portsmouth, NH 03801  
TEL. (603) 431-4899

June 3, 1985

RECEIVED

JUN 11 1985

Ms. Susan Corderman  
Massachusetts DEQE - DSHW  
75 Grove Street  
Worcester, MA 01605

Div. Solid/Hazardous Waste

Re: ATF/Davidson and Sidney Covitch Properties (Formerly AFT/Davidson),  
Whitinsville, Massachusetts

Site Assessment for the Massachusetts DEQE Phases I & II - Site  
Investigation/Remedial Action Guidelines

- a) Hydrogeologic Site Assessment
- b) Monitoring Well Installation

Written Response to Work Plan Comments as Discussed in 5-30-85 Telephone  
Conversation

Dear Ms. Corderman:

The purpose of this letter is to provide the DEQE - DSHW with a written response to the seven items we discussed on the telephone regarding the above referenced work plan. The items are as follows:

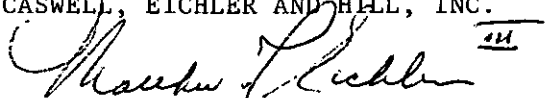
1. We will be gathering split-spoon samples during the monitoring well construction phase of the project.
2. We will take one boring to refusal on both properties
3. The specificity with which we described our boring and well construction work was not meant to preclude other judgements being made in the field. The detail was, rather, meant to give a detailed description of our general approach should field conditions exist as described. We will, however, set a screen at the water table in all cases as discussed in our telephone conversation.
4. We will be providing a water table map, and plume delineation map should contamination be detected.
5. The laboratory (Resource Analysts, Inc.) will be conducting the sampling as described in Attachment E of our submitted Work Plan.

Ms. Susan Corderman  
June 3, 1985  
Page Two

6. We will survey the monitoring wells for vertical and horizontal control to an arbitrary datum, or a U.S.G.S. datum should one be conveniently located.
7. We plan to use a background monitoring well completed near the ATF/ Davidson and Covitch property line as a background well for both investigations.

Should you have any further comments, please call.

Very truly yours,  
CASWELL, EICHLER AND HILL, INC.

A handwritten signature in cursive script, appearing to read "Matthew F. Eichler", with a horizontal line and the number "211" written above the end of the signature.

Matthew F. Eichler  
Principal

MFE/SKK

RECEIVED

JUN 11 1985

Div. Solid/Hazardous Waste

cc: R. Hill  
D. Marques

# CEH Caswell, Eichler and Hill, Inc.

GEOLOGY HYDROLOGY GEOPHYSICS

P.O. Box 4696  
Portsmouth, NH 03801  
TEL. (603) 431-4899

May 30, 1985

RECEIVED  
JUN 12 1985

RECEIVED  
JUN 14 1985  
Div. Solid/Hazardous Waste

Mr. Richard Hill, P.E.  
White Consolidated Industries  
11770 Berea Road  
Cleveland, Ohio 44111

WCI

Re: Auger Investigation of Oil and Mercury Contamination Area

Dear Rich:

We have completed the auger probe investigation of the oil and mercury contamination area adjacent to Building 9 and the raceway on the Covitch property. As the attached schematic shows, seven probes (AP-1 through AP-7) were advanced to a depth of fifteen feet below land surface. In this fashion, we were able to observe the nature of both the subsurface stratigraphy and contamination above and below the water table. The water table was observed to exist at ten feet below land surface adjacent to Building 9, and twelve feet below land surface adjacent to the raceway.

In vertical section, the probes showed the area to consist of two to three feet of gravel and crushed stone (fill) overlying twelve to thirteen feet of silty, clayey fine/medium/coarse sand and gravel, and occasional cobbles. This is commonly known as glacial till. The upper fill was permeated with dark oil of the variety that was commonly used to create a roadbed. The glacial till showed some evidence of oil contamination above the water table where more permeable layers have allowed for preferential horizontal permeability. The zone existing from several feet above the water table to below the water table showed evidence of oil contamination best characterized as saturated. It is assumed that the natural fluctuation of the water table over the years is responsible for the observed thickness of the zone of oil saturation.

Horizontally, the till matrix at AP-1 and AP-2 contained a lesser percentage of fines than did the other probes. The silty, clayey nature of the overburden generally increased in the direction of AP-5, the matrix of which exhibited the greatest percentage of fines.

At the conclusion of the field investigation, the results were discussed with Dan Marques. At that time he expressed a desire to construct a cut-off trench along the wall of the small building attached to Building 9 where AP-1 was completed. The trench would be excavated to several feet below the existing water table, and gently sloped toward AP-1 where a sump and oil separation

JUN 14 1985

unit would be located. The trench would be lined with concrete and the entire face of the raceway and trench along the small building wall would be sealed and grouted as is customary in the construction of a swimming pool wall. The trench would then be backfilled with coarse sand and gravel. In this fashion, given the coarser nature of the native material in the vicinity of AP-1 and AP-2, the area's water table could be depressed and flow would be directed toward the sump. The oil would be removed from the influent, and the effluent water could be recirculated to drainage tiles placed along the foundation of Building 9. This would insure the hydraulic gradient and flushing action necessary to keep the system operational.

Dan requested an estimate of how much influent could be expected to enter the sump. Given an estimated hydraulic gradient of 0.25 ft/ft, an estimated in-situ permeability of  $3.3 \times 10^{-7}$  ft/sec. and a seepage face area of 370 ft<sup>2</sup>, the influent rate should approximate 1800 gallons per day, or slightly more than 1 gallon per minute. The amount of oil that can be separated from this ground-water discharge is indeterminate at this time.

Several factors are important to note in the design stage of the separation system:

A backhoe with approximately an 18 foot reach will be required for construction of the cut-off trench, and constant dewatering will be required.

The entire area of excavation should be paved to prevent infiltration of precipitation.

A subsurface sump inside a "man hole" is envisioned, and therefore, crushed stone should be used to backfill the trenches in the vicinity of the sump. The retaining mesh that will line the sump should be selected, therefore, to contain the thirtieth percentile (d<sub>30</sub>) diameter of crushed stone employed.

In that field estimates have been used in the calculations contained herein, and some variability exists in the nature of the subsurface stratigraphy, system monitoring and adjustment will undoubtedly be required.

We understand that mercury was detected in the oil samples collected by IPC, Inc. during their clean-up work at the site. We would recommend the collection of soil samples in several locations between Building 9 and the raceway, and subsequent analysis for mercury. This testing will give us an idea of the extent of contamination, and the work can be completed during the planned monitoring well installation at the Covitch site. We would advance hollow stem augers to the water table where oil contamination was noted, and take split-spoon soil samples.

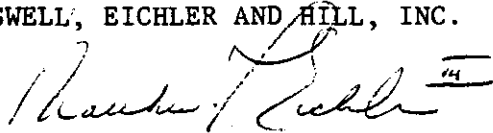
Mr. Richard Hill, P.E.

May 30, 1985

Page Three

Should you have any questions or further informational needs regarding this letter, please call.

Very truly yours,  
CASWELL, EICHLER AND HILL, INC.

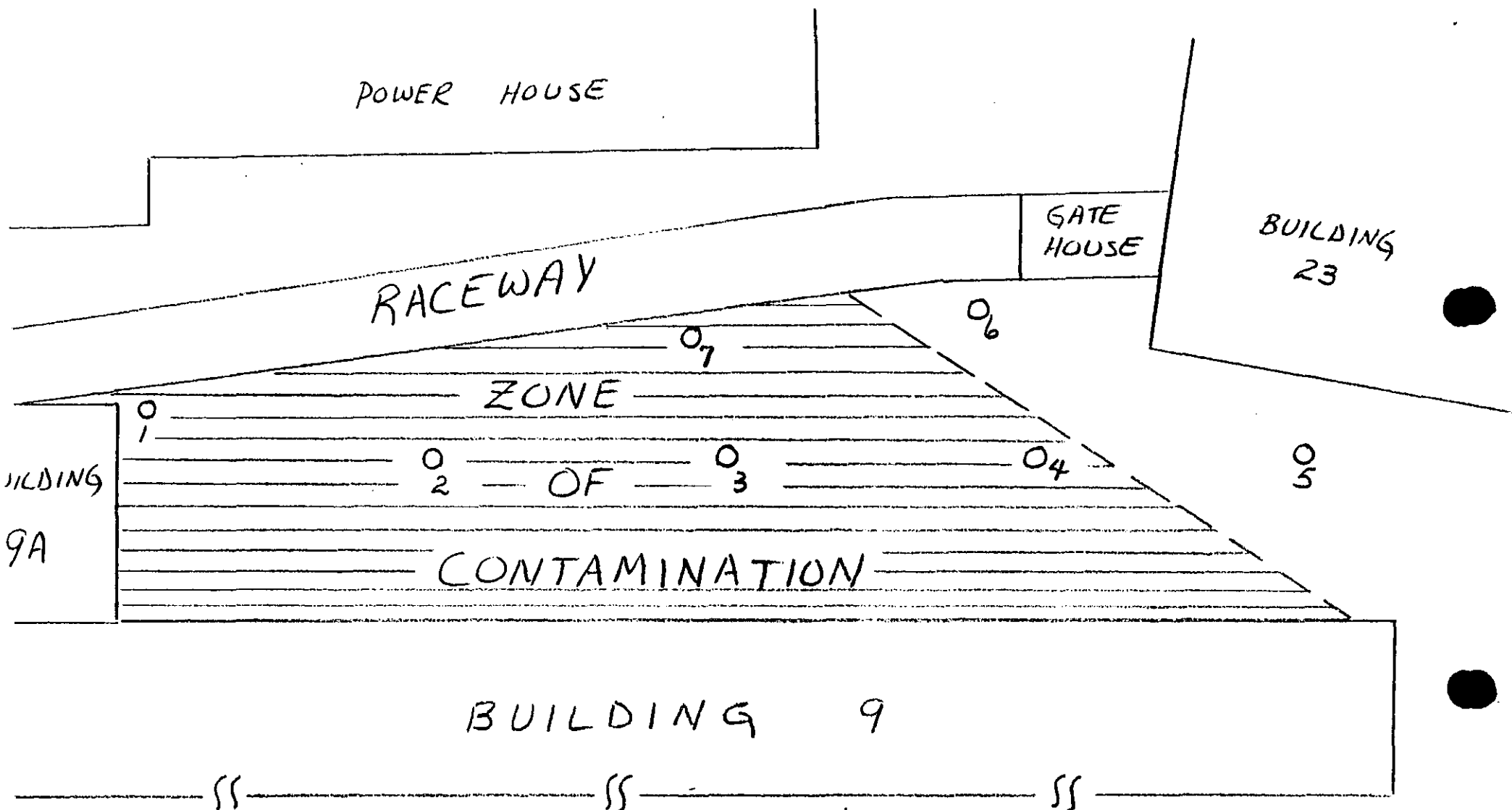
A handwritten signature in dark ink, appearing to read "Matthew F. Eichler III", with a horizontal line drawn through the end of the signature.

Matthew F. Eichler III  
Principal

cc: D. Marques

MFE/SKK

RECEIVED  
JUN 14 1985  
Div. Solid/Hazardous Waste



APPROXIMATE SCALE : 1" = 25'

O<sub>7</sub> = AUGER PROBE

CEH 5-85

RECEIVED  
JUN 14 1985  
Div. Solid Hazardous Waste

ATF Davidson

5/29/85

8-9 holes to below water  
table

defined plume based on  
floating product

dug trench along raceway  
below wt - put 3"

cement wall on raceway

pitch trench & collect

w/oil/water separator

fill trench w/sand

pump & collecting well

will be in manhole

1/4" oil on water in the hole

5/24/85

Richard Hill said  
that soil samples  
from the pit  
showed 1-5 ppm  
mercury - they  
will now sample  
stuff from raceway  
for mercury.

# CEH Caswell, Eichler and Hill, Inc.

GEOLOGISTS AND HYDROLOGISTS

P.O. Box 4696  
Portsmouth, N.H. 03801  
Tel. 207-439-4853

May 24, 1985

RECEIVED

JUL 3 1985

Div. Solid/Hazardous Waste

Mr. Richard Hill, P.E.  
White Consolidated Industries, Inc.  
11770 Berea Road  
Cleveland, Ohio 44111

Re: Sidney Covitch Properties (Formerly ATF/Davidson Properties)  
Whitinsville, Massachusetts.

Site Assessment for the Massachusetts DEQE Phases I & II -  
Site Remedial Action Guidelines

- a) Hydrogeologic Site Assessment
- b) Monitoring Well Installation
- c) Ground Water Sampling and Analysis

Dear Rich:

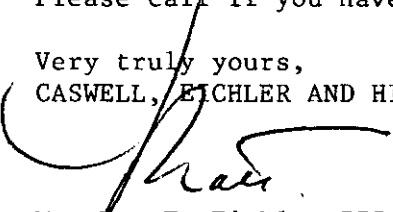
The purpose of this letter is to outline for you and the DEQE those investigations that we recommend to evaluate the present ground water beneath the above referenced properties which abut the Mumford River. Additionally, we will evaluate the ground water quality adjacent to a former coal ash disposal area across the river from the referenced facilities.

As the enclosed site map shows, the construction of fifteen permanent monitoring wells are recommended. Drilling, well construction, sampling/laboratory methodologies and data analyses are anticipated to parallel those previously outlined in our work plan for the AFT/Davidson facility that abuts the Covitch property. We recommend that the Covitch work be completed concurrently with the AFT/Davidson investigation to insure driller availability, eliminate double mobilization charges, and cause the least amount of impact on the overall schedule.

This letter and attachments should serve as your work plan submittal to the DEQE. Upon receipt of their comments or approval, we will ammend the scope if necessary and arrange for contractor mobilization.

Please call if you have any questions or further needs.

Very truly yours,  
CASWELL, EICHLER AND HILL, INC.

  
Matthew F. Eichler III  
Principal

RECEIVED

JUN 26 1985

MFE/SKK

WCI

cc: D. Marques North Whitefield, Maine — Needham, Massachusetts



John

C. M. A. P. C. D.

MAY 24 1985

RECEIVED

**LANE & ALTMAN**  
ATTORNEYS AT LAW  
201 DEVONSHIRE STREET  
BOSTON, MASSACHUSETTS 02110

NEWTON A. LANE  
ARTHUR D. ALTMAN  
BERNARD N. BORMAN  
NATHAN T. WOLK  
DONALD M. BLOCH  
ROBERT M. ROSEN  
DAVID L. ROKOFF  
FRANK D. ARONSON  
LAWRENCE M. SLATER  
ARTHUR D. GOLD  
BARRY M. RICH  
GREGORY J. ENGLUND  
BENJAMIN W. MOULTON  
JOSEPH F. MAZZELLA  
JOHN F. DREW  
SAMUEL M. SHAFNER  
PETER A. JOHNSON  
A. MIRIAM JAFFE  
ROBERT S. BURSTEIN  
MARY E. VALLE  
MARC C. LAREDO

EDWARD A. NATHANSON  
1916-1955

HYMAN H. RUDOFKY  
1927-1979

TELEPHONE (617) 357-5200

May 23, 1985

Mr. Edmond G. Benoit  
Deputy Regional Environmental Engineer  
Department of Environmental Quality  
Engineering  
Central Region  
75 Grove Street  
Worcester, Massachusetts 01605

Re: Alleged Oil/Hazardous Material  
Main Street, Northbridge, Massachusetts

Dear Mr. Benoit:

In response to your letter of April 30, 1985, please be advised that this law firm represents Mr. Sidney Covich as he is Trustee of Whitinsville Redevelopment Corp., the record owner who has informed you orally that he will accept responsibility for the aforementioned release/threat of release of oil/hazardous material, to the extent that his recent ownership would subject him thereto under Chapter 21E. Please be advised that Mr. Covich purchased this property on October, 1984 and that his predecessor in title, White Consolidated Industries, Inc., has an Indemnity Agreement indemnifying our client for any hazardous waste or material pursuant to M.C.L. c. 21E. As you know, our client has attended a D.E.Q.E. hearing on May 3 and has hired a consultant to prepare an appropriate clean-up plan.

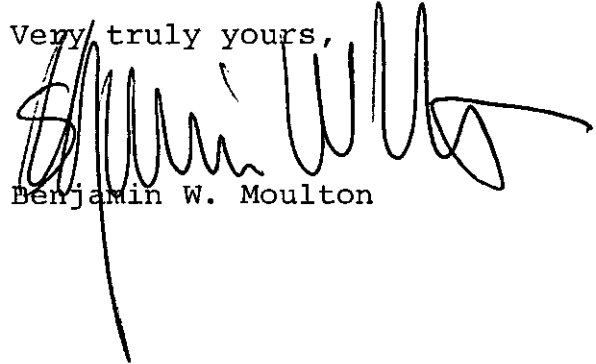
We also wish to point out that it has been our client who has brought this matter to the State's attention and who has fully cooperated with the D.E.Q.E. It is our hope

LANE & ALTMAN

Mr. Edmond G. Benoit  
May 23, 1985  
Page 2

that this matter may be handled expeditiously and handled on the administrative level. If you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Benjamin W. Moulton", with a long, sweeping horizontal stroke extending to the right.

Benjamin W. Moulton

BWM:kam

WHITE CONSOLIDATED INDUSTRIES, INC.

CLEVELAND, OHIO 44111

EXECUTIVE OFFICES

RICHARD E. HILL, P.E.  
ENVIRONMENTAL ENGINEER

May 20, 1985

Ms. Susan Corderman  
Massachusetts Department of  
Environmental Quality Engineering  
75 Grove Street - Box 13  
Worcester, Massachusetts 01605

RECEIVED

MAY 23 1985

Solid/Hazardous Waste

Dear Susan:

This letter is to confirm the understandings reached between ATF/Davidson and your Agency during your inspection of the property owned by Sidney Covich, which we are cleaning up. We understand that your Agency has found the clean up (removal) actions relative to the oil in the raceway adequate for the present time. As such, we have determined that project to be complete for the present time and dismissed the clean up contractor (Inland Pollution Control).

Secondly, we dug a hole in the pit area to determine the presence of oil contamination at the water table. As you saw, oil and water accumulated in the bottom of the pit. We sucked this oil and the pit did not refill with water during the time we were present.

We indicated at the time that we were planning to bring in an auger so that we could drill test holes at a number of spots in the general area of the pit in order to determine the extent of the oil contamination. This exploration is scheduled for May 28th and 29th.

Further, we showed you a map of the facility with preliminary observation well sites marked.

After your Agency has approved my submission to you dated May 7, 1985 we will formally submit a plan of the overall site study of the Covich property.

Sincerely,



Richard E. Hill

/ecc

WHITE CONSOLIDATED INDUSTRIES, INC.

CLEVELAND, OHIO 44111

EXECUTIVE OFFICES

RICHARD E. HILL, P.E.  
ENVIRONMENTAL ENGINEER

May 7, 1985

CERTIFIED MAIL

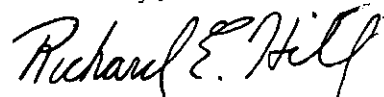
Ms. Susan Corderman  
Massachusetts Department  
of Environmental Quality Engineering  
75 Grove Street  
Box 13  
Worcester, MA 01605

Dear Susan:

In accordance with my letter to John Desmond of March 14, 1985, I am submitting to your agency a proposal for hydro-geological investigation of the ATF/Davidson landfill site in Whitinsville.

After you have had a chance to review this, I will call to arrange a meeting to finalize our plans on this matter with your agency.

Sincerely,



Richard E. Hill

/ecc  
Enclosures

RECEIVED

MAY 10 1985

Div. Solid/Hazardous Waste

ATF/Davidson / Corick / MA DEQE Meeting  
5/3/85 9:00 am

Phone #

216 252 3700 623 431 4899	Richard Hill Matt Eichler Marc Laredo Leonardo Solles Signey Corick Spaulding R. Aldrich	Env. Eng. Hydrogeologist attorney	White Consolidated Caswell Eichler & Hill, Inc. Lane & Altman The Shops at Whitinsville Signey Corick Northbridge
234 7451	Susan Corderman	DEQE-DSHW	
234 7451	DANIEL MARQUES		A.T.F. DAVIDSON Co.
792-7653	Frank Sciannamero (IR)	DEQE	
792-7653	John Desmond	DEQE-DSHW	
234-6680	Marianne Bergenholz	Northbridge Board of Health	
234-3102	Don Laliberty	Northbridge	



ATF-DAVIDSON COMPANY

ID ✓  
DH ✓  
SC ✓

MAIN STREET  
WHITINSVILLE, MASSACHUSETTS 01588  
(617) 234-7451 TELEX 928-429

May 1, 1985

C. M. A. P. C. D.

MAY 3 1985

RECEIVED

Mr. Edmond G. Benoit  
Deputy Regional Environmental Engineer  
The Commonwealth of Massachusetts  
Dept. of Environmental Quality Engineering  
75 Grove Street  
Worcester, Mass. 01605

Re: WRITTEN NOTICE OF RESPONSIBILITY

Dear Mr. Benoit:

Your notice relative to the former ATF-Davidson facility, Main Street, Whitinsville, Massachusetts, dated 4-30-85, was addressed to me. Please be advised that on October 23, 1984 the facility in question was conveyed to Mr. Sidney Covich. Any correspondence relating to that property should be mailed to:

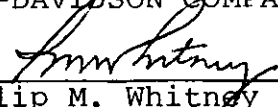
Mr. Sidney Covich  
Main Street  
Whitinsville, Mass. 01588

Also, any future correspondence relating to property owned by ATF-Davidson Company, Division of White Consolidated Industries, Inc., should be mailed to:

WHITE CONSOLIDATED INDUSTRIES, INC.  
11770 Berea Road  
Cleveland, Ohio 44111  
Attention: Mr. Richard Hill

Very truly yours,

ATF-DAVIDSON COMPANY

  
Philip M. Whitney  
Vice President Finance

PMW:hd

cc: Spaulding R. Aldrich, LHWC  
Northbridge Conservation Commission  
Northbridge Board of Health  
James Coleman, DEQE, Boston  
Daniel Glanz, EPA  
Stephen DeGabriele, DEQE, Boston

Source



792-7653

*The Commonwealth of Massachusetts*  
*Executive Office of Environmental Affairs*  
*Department of Environmental Quality Engineering*  
*Central Region*  
*75 Grove Street, Worcester, Massachusetts 01605*

April 30, 1985

Philip Whitney  
A.T.F. Davidson  
Main Street  
Whitinsville, Massachusetts 01588

Re: Oil/Hazardous Material  
Release/Threat of Release  
At Main Street, Northbridge,  
Massachusetts

WRITTEN NOTICE OF  
RESPONSIBILITY

Dear Mr. Whitney:

As a result of an investigation conducted by the Department of Environmental Quality Engineering (DEQE) on April 24, 1985, the Department has determined that there is/has been a release/threat of release of oil/hazardous material including waste oil and mercury, at the former A.T.F. Davidson facility, Main Street, Whitinsville, Massachusetts.

This determination is based on the following information obtained during the site investigation:

- 1) Test pit excavations, along and adjacent to the south side of building #9, contained oil and oil contaminated soils; (In addition one of the test pits contained a small unknown quantity of mercury metal.)
- 2) That a water channel (raceway) transports water from Whitin Pond travels beneath the facility and empties into the Mumford River; (The raceway was used, in prior years, to produce hydroelectric power at the facility and is equipped with a number of water gate locks to control water flow.)
- 3) That the waters of the raceway located down gradient from the power plant (boiler room) at the gate lock in building #9 contained a large accumulation of unknown quantity of oil;
- 4) That the open drainage culvert located in base floor of the power plant contained an accumulation of unknown quantity of oil/water mixture;
- 5) That the raceway is/has discharged oil to the waters of the Mumford River for an unknown period of time;
- 6) That a heavy petroleum odor exists in the buildings and area adjacent to where oil has accumulated; and
- 7) That there are numerous locations at the facility where oil/hazardous materials are deposited or stored in containers at various stages of deterioration.

Philip Whitney

WRITTEN NOTICE OF  
RESPONSIBILITY

April 30, 1985

Page 2

Such incident is governed by Chapter 21E of the General Laws of Massachusetts (hereinafter "M.G.L.c.21E"), the Massachusetts Oil and Hazardous Material Release Prevention and Response Act, which was enacted on March 24, 1983, through Section 5 of Chapter 7 of the Acts and Resolves of Massachusetts of 1983.

The Department has determined that you are, under the provisions of M.G.L.c.21E, §5(a), responsible for the occurrence of such release/threat of release. This letter is intended to (1) inform you, in writing, of the Department's determination that you are responsible for such release/threat of release; (2) provide you an opportunity immediately to accept such responsibility, and (3) advise you of the potential consequences of your failure to accept such responsibility.

Your acceptance of responsibility for such release/threat of release means that you will (1) enter into a contract with a consultant knowledgeable in hazardous waste site assessment, approved by the Department, to take any necessary remedial and/or preventive response actions (i.e. assessment, containment and/or removal actions) relative to such release/threat of release and (2) pay for (a) all response costs incurred by the Department due to such release/threat of release and (b) all damages sustained from any injury to or destruction or loss of natural resources due to such release/threat of release.

If you fail to accept responsibility for such release/threat of release, the Department will, pursuant to M.G.L.c.21E, §4, take or arrange for any necessary response actions relative thereto, and the Commissioner of the Department will, pursuant to M.G.L.c.21E, §11, request the Attorney General of the Commonwealth of Massachusetts to bring a civil and/or criminal action against you under M.G.L.c.21E. Specifically, the statute subjects any person who is responsible for a release/threat of release of oil/hazardous material to the following civil liability and penalties and criminal fines and sanctions:

- (1) civil liability for (a) all response costs incurred by the Department due to such a release/threat of release and (b) all damages for any injury to or destruction or loss of natural resources due to such a release/threat of release. Such liability is imposed jointly and severally, and without regard to fault, upon any person who is responsible for such a release/threat of release (M.G.L.c.21E, §5(a)); and
- (2) civil liability for up to three (3) times the amount of civil liability for costs and damages as described in paragraph (1) above. Such treble liability is imposed jointly and severally upon any person who is responsible for such a release/threat of release (M.G.L.c.21E, §5(e)); and



Philip Whitney  
WRITTEN NOTICE OF RESPONSIBILITY  
April 30, 1985

Page 3

- (3) a civil penalty of not more than twenty-five thousand dollars (\$25,000.00) for each violation of M.G.L.c.21E or any ORDER issued or regulation adopted thereunder (M.G.L.c.21E, § 11); and/or
- (4) a criminal fine of not more than twenty-five thousand dollars (\$25,000.00) and/or imprisonment for not more than five (5) years for each such violation (M.G.L.c.21E, §11). Each day such violation occurs or continues constitutes a separate violation (M.G.L.c.21E, §11).

The Department advises you to accept responsibility for the aforementioned release/threat of release of oil/hazardous material and, thereby, avoid the financial consequences resulting from a successful legal action brought against you under M.G.L.c.21E by the Commonwealth of Massachusetts.

Your acceptance of responsibility must include the following at a minimum:

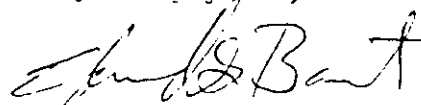
- 1) By May 3, 1985, the engaging of a consultant knowledgeable in assessing potential hazardous waste/material sites.
- 2) Attendance at a meeting on May 3, 1985, at 9:00 a.m. in the Central Region DEQE office, to discuss proposed site assessment and clean-up and to establish an acceptable schedule of implementation of this work.
- 3) To conduct, in a timely manner, whatever investigations, sampling, and remedial measures that are deemed appropriate by the Department to prevent a further release or threat of release at said site.
- 4) Your acknowledgement and acceptance of these responsibilities within five (5) days of your receipt of this letter.

Philip Whitney  
WRITTEN NOTICE OF RESPONSIBILITY  
April 30, 1985

Page 4

A copy of the text of M.G.L.c.21E is available, upon written request, from the Bookstore, Room 116, State House, Boston, Massachusetts 02133.

Very truly yours,



Edmond G. Benoit  
Deputy Regional Environmental Engineer

EGB/SHC/jc

cc: Spaulding R. Aldrich, LHWC  
Northbridge Conservation Commission  
Northbridge Board of Health  
James Coleman, DEQE, Boston  
Daniel Glanz, EPA  
Stephen DeGabriele, DEQE, Boston



792-7653

*Source*

*The Commonwealth of Massachusetts*  
*Executive Office of Environmental Affairs*  
*Department of Environmental Quality Engineering*  
*Central Region*  
*75 Grove Street, Worcester, Massachusetts 01605*

April 30, 1985

Sidney Covich  
Main Street  
Whitinsville, Massachusetts 01588

Re: Oil/Hazardous Material  
Release/Threat of Release  
at Main Street, Northbridge,  
Massachusetts 01588

WRITTEN NOTICE OF  
RESPONSIBILITY

Dear Mr. Covich:

As a result of an investigation conducted by the Department of Environmental Quality Engineering (DEQE) on April 24, 1985, the Department has determined that there is/has been a release/threat of release of oil/hazardous material including waste oil and mercury, at the former A.T.F. Davidson facility, Main Street, Whitinsville, Massachusetts.

This determination is based on the following information obtained during the site investigation:

- 1) Test pit excavations, along and adjacent to the south side of building #9, contained oil and oil contaminated soils; (In addition one of the test pits contained a small unknown quantity of mercury metal.)
- 2) That a water channel (raceway) transports water from Whitin Pond travels beneath the facility and empties into the Mumford River; (The raceway was used, in prior years, to produce hydroelectric power at the facility and is equipped with a number of water gate locks to control water flow.)
- 3) That the waters of the raceway located down gradient from the power plant (boiler room) at the gate lock in building #9 contained a large accumulation of unknown quantity of oil;
- 4) That the open drainage culvert located in base floor of the power plant contained an accumulation of unknown quantity of oil/water mixture;
- 5) That the raceway is/has discharged oil to the waters of the Mumford River for an unknown period of time;
- 6) That a heavy petroleum odor exists in the buildings and area adjacent to where oil has accumulated; and
- 7) That there are numerous locations at the facility where oil/hazardous materials are deposited or stored in containers at various stages of deterioration.

Such incident is governed by Chapter 21E of the General Laws of Massachusetts (hereinafter "M.G.L.c.21E"), the Massachusetts Oil and Hazardous Material Release Prevention and Response Act, which was enacted on March 24, 1983, through Section 5 of Chapter 7 of the Acts and Resolves of Massachusetts of 1983.

The Department has determined that you are, under the provisions of M.G.L.c.21E, §5(a), responsible for the occurrence of such release/threat of release. This letter is intended to (1) inform you, in writing, of the Department's determination that you are responsible for such release/threat of release; (2) provide you an opportunity immediately to accept such responsibility, and (3) advise you of the potential consequences of your failure to accept such responsibility.

Your acceptance of responsibility for such release/threat of release means that you will (1) enter into a contract with a consultant knowledgeable in hazardous waste site assessment, approved by the Department, to take any necessary remedial and/or preventive response actions (i.e. assessment, containment and/or removal actions) relative to such release/threat of release and (2) pay for (a) all response costs incurred by the Department due to such release/threat of release and (b) all damages sustained from any injury to or destruction or loss of natural resources due to such release/threat of release.

If you fail to accept responsibility for such release/threat of release, the Department will, pursuant to M.G.L.c.21E, §4, take or arrange for any necessary response actions relative thereto, and the Commissioner of the Department will, pursuant to M.G.L.c.21E, §11, request the Attorney General of the Commonwealth of Massachusetts to bring a civil and/or criminal action against you under M.G.L.c.21E. Specifically, the statute subjects any person who is responsible for a release/threat of release of oil/hazardous material to the following civil liability and penalties and criminal fines and sanctions:

- (1) civil liability for (a) all response costs incurred by the Department due to such a release/threat of release and (b) all damages for any injury to or destruction or loss of natural resources due to such a release/threat of release. Such liability is imposed jointly and severally, and without regard to fault, upon any person who is responsible for such a release/threat of release (M.G.L.c.21E, §5(a)); and
- (2) civil liability for up to three (3) times the amount of civil liability for costs and damages as described in paragraph (1) above. Such treble liability is imposed jointly and severally upon any person who is responsible for such a release/threat of release (M.G.L.c.21E, §5(e)); and

Sidney Covich  
WRITTEN NOTICE OF RESPONSIBILITY  
April 30, 1985

Page 3

- (3) a civil penalty of not more than twenty-five thousand dollars (\$25,000.00) for each violation of M.G.L.c.21E or any ORDER issued or regulation adopted thereunder (M.G.L.c.21E, §11); and/or
- (4) a criminal fine of not more than twenty-five thousand dollars (\$25,000.00) and/or imprisonment for not more than five (5) years for each such violation (M.G.L.c.21E, §11). Each day such violation occurs or continues constitutes a separate violation (M.G.L.c.21E, §11).

The Department advises you to accept responsibility for the aforementioned release/threat of release of oil/hazardous material and, thereby, avoid the financial consequences resulting from a successful legal action brought against you under M.G.L.c.21E by the Commonwealth of Massachusetts.

Your acceptance of responsibility must include the following at a minimum:

- 1) By May 3, 1985, the engaging of a consultant knowledgeable in assessing potential hazardous waste/material sites.
- 2) Attendance at a meeting on May 3, 1985, at 9:00 a.m. in the Central Region DEQE office, to discuss proposed site assessment and clean-up and to establish an acceptable schedule of implementation of this work.
- 3) To conduct, in a timely manner, whatever investigations, sampling, and remedial measures that are deemed appropriate by the Department to prevent a further release or threat of release at said site.
- 4) Your acknowledgement and acceptance of these responsibilities within five (5) days of your receipt of this letter.

Sidney Covich  
WRITTEN NOTICE OF RESPONSIBILITY  
April 30, 1985

Page 4

A copy of the text of M.G.L.c.21E is available, upon written request,  
from the Bookstore, Room 116, State House, Boston, Massachusetts 02133.

Very truly yours,

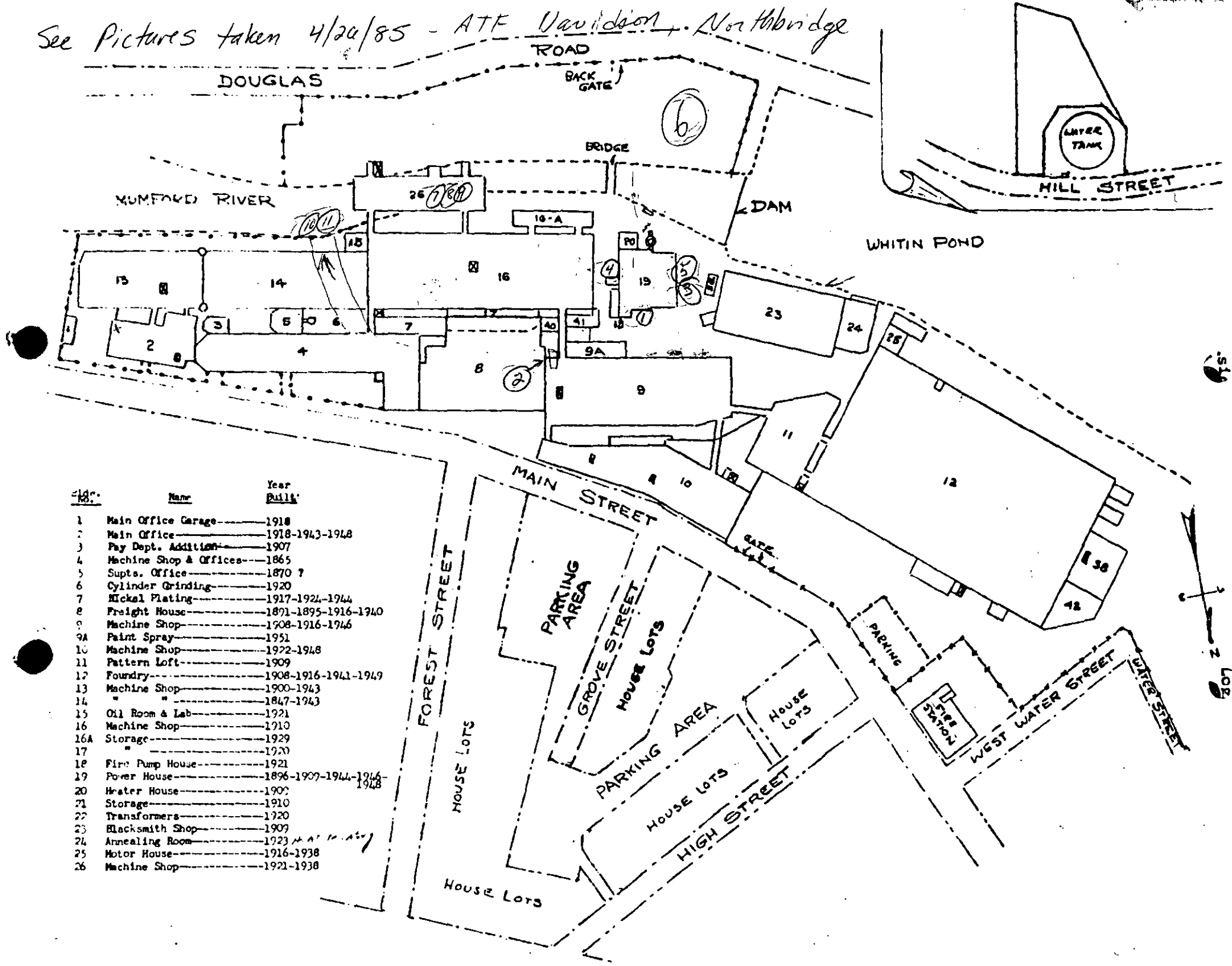


Edmond G. Benoit  
Deputy Regional Environmental Engineer

EGB/SHC/jc

cc: Spaulding R. Aldrich, LHWC  
Northbridge Conservation Commission  
Northbridge Board of Health  
James Coleman, DEQE, Boston  
Daniel Glanz, EPA  
Stephen DeGabriele, DEQE, Boston

See Pictures taken 4/20/85 - ATF Davidson Northbridge



Idg. No.	Name	Year Built
1	Main Office Garage	1918
2	Main Office	1918-1943-1948
3	Pay Dept. Addition	1907
4	Machine Shop & Offices	1865
5	Supts. Office	1870 ?
6	Cylinder Grinding	1920
7	Mickal Plating	1917-1924-1944
8	Freight House	1891-1895-1916-1940
9	Machine Shop	1908-1916-1946
9A	Paint Spray	1951
10	Machine Shop	1922-1948
11	Pattern Loft	1909
12	Foundry	1908-1916-1941-1949
13	Machine Shop	1900-1943
14	"	1847-1943
15	Oil Room & Lab	1921
16	Machine Shop	1910
16A	Storage	1929
17	"	1920
18	Fire Pump House	1921
19	Power House	1896-1907-1944-1946-1948
20	Water House	1900
21	Storage	1910
22	Transformers	1920
23	Blacksmith Shop	1909
24	Annealing Room	1923
25	Motor House	1916-1938
26	Machine Shop	1921-1938

Locations of photos taken 4/24/85 - Cde G  
 are circled in red

DOUGLAS

ROAD

BACK GATE

BRIDGE

MUMFORD RIVER

DAM

WHITIN POND

HILL STREET

WATER TANK

#	Name	Year Built
1	Main Office Garage	1918
2	Main Office	1918-1943-1948
3	Pay Dept. Addition	1907
4	Machine Shop & Offices	1865
5	Supts. Office	1870 ?
6	Cylinder Grinding	1920
7	Mickel Plating	1920

1944  
 1916-1940  
 1946

1942-1949

1944-1948

1947

Susan -  
 here are photos  
 from our site  
 inspection 4/24

C

FOREST STREET

MAIN STREET

PARKING AREA

GROVE STREET

HOUSE LOTS

PARKING AREA

HOUSE LOTS

HIGH STREET

HOUSE LOTS

PARKING

STREET

WEST WATER STREET

WATER STREET

⑧ and ⑨  
 are to the  
 west of this  
 map.



WHITE CONSOLIDATED INDUSTRIES, INC.  
CLEVELAND, OHIO 44111

RECEIVED

MAR 21 1985

Div. Solid/Hazardous Waste

EXECUTIVE OFFICES

RICHARD E. HILL, P. E.  
ENVIRONMENTAL ENGINEER

March 14, 1985

Mr. John A. Desmond  
Division of Hazardous Waste  
The Commonwealth of Massachusetts  
Central Region  
75 Grove Street, Box 13  
Worcester, Massachusetts 01605

Dear Mr. Desmond:

This is to confirm my conversation with you today relative to a site assessment of the landfill located on our property in Whitinsville, Massachusetts operated under the name of ATF/Davidson Company.

We plan to hire the hydrogeological firm of Caswell, Eichler and Hill, Inc. of North Whitefield, Maine to evaluate both water and soil quality at the site. You should plan our our submission for your approval of a sampling and analysis program no later than May 13, 1985.

If you have any questions, please call me at 216/252-3700.

Sincerely,



Richard E. Hill

/ecc

cc: Dr. W. Bradford Caswell



792-7653

*The Commonwealth of Massachusetts*  
*Executive Office of Environmental Affairs*  
*Department of Environmental Quality Engineering*  
*Central Region*  
*75 Grove Street, Worcester, Massachusetts 01605*

January 22, 1985

Mr. Daniel Marques  
Facilities Manager  
ATF - Davidson  
Main Street  
Whitinsville, Massachusetts 01588

Re: Northbridge, Massachusetts  
ATF - Davidson  
Former Landfill and  
Surface Impoundment

Dear Mr. Marques:

The Central Region office of the Department of Environmental Quality Engineering has reviewed information provided by you concerning the ATF - Davidson facility (formerly Whitin Machine Works) in the Whitinsville section of Northbridge, Massachusetts.

We request that you attend a meeting on February 6, 1985, at 10:00 a.m., in our offices, to discuss the status of the former landfill and surface impoundment at this facility. Please bring any additional information you may have, as well as the results from downstream sampling in the Mumford River, if it was performed.

If you have any questions, please contact Susan Corderman at 792-7653.

Very truly yours,

John A. Desmond, Chief  
Solid and Hazardous Materials

JAD/SHC/jc

May 16, 1984

Jacob Edwards  
State Waste Programs  
U.S. EPA, Room 1903  
JFK Federal Building  
Boston, MA 02203

**C. M. A. P. C. D.**

MAY 21 1984

**RECEIVED**

Dear Mr. Edwards:

ATF-Davidson Company requests that its hazardous waste treatment facility permit be terminated for two reasons.

First, the permit application refers to treatment of electroplating wastewater. We filed the application as was required by the federal regulation for this wastewater treatment system. After we had filed, the rules were changed so that these types of facilities were covered only by the N.P.D.E.S. System. Because of this, we believe that we do not need a hazardous waste treatment permit for this operation.

Secondly, we had also filed for storage authority in our application. Our feeling was that as long as we needed a permit anyway, we should be able to collect our wastes into quantities that would fill a semi-truck trailer. Since our waste generation rate is so low, this would require more than 90 days. However, since we do not require a treatment permit and since the storage over 90 days requirements are so burdensome (relative to paperwork), we now feel that it is in our best interest to remove all waste within 90 days regardless of transportation premiums.

We are enclosing a statement which we believe terminates our permit application and interim status. If you have need for further information, please call me at (617)234-7451.

Very truly yours,

ATF-DAVIDSON COMPANY

Daniel Marques  
Facilities & Energy Mgr.



/lk  
attachment

cc: Nancy Wrenn  
Division of Hazardous Waste  
DEQE  
1 Winter Street  
Boston, MA 02108

DEQE Regional Office  
Central Region  
75B Grove Street  
Worcester, MA 01605

C E R T I F I C A T I O N

I, Daniel Marques, Facilities & Energy Mgr., hereby  
(name) (position)

certify that ATF-Davidson Co., MAD046128559, which  
(name of company) (EPA I.D. #)

notified the U.S. Environmental Protection Agency ("EPA") that it treats, stores and/or disposes of hazardous waste, at all times from this date forward (1) will not accumulate any hazardous waste for more than 90 days; (2) will accumulate hazardous waste in compliance with 310 CMR 30.340; (3) will not store, treat, or dispose of hazardous waste; and (4) will comply with all other applicable requirements of 310 CMR 30.000.

I understand that the Department of Environmental Quality Engineering is deferring applicability of the financial responsibility requirements of 310 CMR 30.900 as a result of ATF-Davidson Co. having submitted  
(name of company)

a request for change of status and this certification, so long as

ATF-Davidson Co. abides by the terms of this certification.  
(name of company)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment.

  
(Signature)

Daniel Marques

(Name typewritten)

M E M O R A N D U M

CERCLA LIST

RE: A.T.F. Davidson  
Main Street  
Whitinisville, Massachusetts 01588

TO: John A. Desmond  
FROM: John F. Kronopolus *gfk*  
DATE: December 10, 1982

A meeting/inspection was conducted at the subject facility on December 8, 1982 in conjunction with CERCLA List Activity. The following was revealed during the meeting/inspection:

- (1) A.T.F. Davidson is a subsidiary of White Consolidated Industries. Daniel Marques, Manager of Facilities for A.T.F. stated that White Consolidated Industries and A.T.F. have operated this site since its construction in the early 1900's (See attached sheets for layout of site and dates of building construction). The site was primarily used to manufacture textile machinery until 1979 at which time it started to produce its current product, graphic arts equipment.
- (2) The operations in these buildings included machinery of metal stock, plating, painting, heat treating, and foundry operations. The wastes generated included foundry sand (isopropylene binder), paint, plating sludge, plating rinsewaters, bromide salt baths, solvents, cutting oils, and coal ash.
- (3) All of the wastes stated above, except for the plating rinses, were disposed of at the Landfill located on the sites. Mr. Marques stated that he was pretty sure that approximately 90% of what was disposed of was foundry sand and approximately 5% of what was disposed of was coal ash from their coal fired heating system. The other 5% was the remaining wastes mentioned above. Mr. Marques will research and write up as complete a history of the site as possible regarding manufacturing operations wastes produced and submit it to this office as soon as possible.
- (4) Plating rinsewaters, spent stripper and cleaning solutions, along with some sludges were discharged to the adjacent Mumford River until mid-1982. At that time Mr. Marques installed an ion exchange system which allows A.T.F. to re-use all rinsewaters from the plating operation. Copies of 1981 and 1982 chemical analyses of effluent from the plating operations (in file) reveal that the parameters tested for, appear very low and not of major concern regarding CERCLA Activity. If these analyses accurately reflect what was discharged to the river in years past, then this discharge probably did not cause or will cause an environmental problem. Mr. Marques will submit a copy of analytical results obtained from a sample taken from the Mumford River downstream of the site.

December 10, 1982

RE: A.T.F. Davidson  
Main Street  
Whitinsville, Massachusetts 01588

- (5) A.T.F. currently employs less than 500 people (2700 in prosperous times) and produces approximately 1-2 drums of hazardous waste. Much of the activity formerly done at this site are now done by outside firms.

The Landfill may be of concern regarding CERCLA Activity as it is unknown what quantities of a particular waste is buried there. Also the Landfill is located approximately 100 feet from the Mumford River. The discharges from the plating operations may not be of too much concern regarding CERCLA Activity. Mr. Marques' history of the site and the chemical analysis of the river may help to determine what the next course of action will be.

JFK/bk

Sub → ATF - Davidson

12/9/82

Plating Sludge

White Consolidated Ind, Inc.

Plating Effluent to <sup>mountain</sup> RIVER

Pretreatment → Ion exchange

Backwash to barrels → Chem Waste Management

Landfill - Foundry Ash . Cleveland

White Richard Hill → 216-252-3700

<sup>Solvents</sup>  
25% Ash

90% Foundry sand - 150 propylene - Binder  
resins  
Paint - 1A + Booth  
Plating Sludge  
Salt Bath - Bromide & Sulfamates  
Cutting oils

2500 - 2800 people employed 1960's

500 NOW

1.3 mile square ft of mfg plant

Textile Plant to 1979 → founding for  
textile plant  
mfg graphic Arts machinery → plating

Mr MARQUESS will give history of site.

Chemical analysis of water - downstream.

**DEQE - Division of Hazardous Waste - Site Log**

**Completed By:** John F. Kronopolus

**Date:** 12/8/82

**Site Name:** A.T.F. Davidson - Discharge to River & Landfill

**Site Address:** Main Street, Whitinsville, MA 01588

**1. Site History:**

A.T.F. Davidson (A subsidiary of White Consolidated Industries) manufactured textile machinery from the 1920's to 1979 at which time it started to manufacture its current product, graphic arts machinery. The operations in these buildings include machining of metal stock, plating, painting, heat treating, and foundry operations. The plating rinses were discharged to the Mumford River with EPA approval (See attached reports submitted to the EPA) until a treatment - recirculation system was put in operation in mid 1982. All other wastes probably found their way to the landfill that ATF operated located between the main facility and their "Arcade" building. (See attached Memo). Daniel Marques, Manager of Facilities, will submit a history of the site.

**2. Wastes on Site and Impacts: ( Copies of pertinent data may be attached.)**

Waste Type	Collected & Analyzed By	Date	Results (Include Physical State & Quantity)
			Currently Under Investigation

**3. Impacts**

	Collected & Analyzed By	Date	Location and Results
Surface Waters			Currently Under Investigation
Sediments			Currently Under Investigation
Soils			Currently Under Investigation
Groundwater			
Public W.S.			Currently Under Investitation
Private W.S.			Currently Under Investigation
Other			Currently Under Investigation



	Collected & Analyzed By	Date	Location & Results
Air	Does not appear to be applicable.		
Particulates			
Organics			
Odors			
Other			

#### Site Security

Is the site accessible to public?

Locked fences surround ATF Property

Is the waste uncontrolled? (e.g. leaking drums, unlined lagoon, leachate)

Landfill is unlined

Fire & Explosion potential:

Minimal if any

#### Public health impacts:

Currently under investigation

Distance to nearest surface water: Landfill is 75ft. from Mumford River Public water supply: No.

Other uses of surface water within 3 mile radius(industrial, irrigation, etc.):

Possibly used as non-contact cooling water. River may also receive NPDES permitted wastes.

Population served by potentially impacted surface water within 3 mile radius: 0

Distance to nearest ground water supply: 1 Mile Public or private supply: Public

Other uses of ground water within 3 mile radius (industrial, irrigation) :

Under Investigation

Depth to ground water: Unknown Soil permeability: Unknown Depth to bedrock: Unknown

#### Demographics

Population within 3 mile radius: 12,000

Number of buildings within 3 mile radius: Unknown Type: Residential Commercial Industrial

Nearest buildings to site: ATF Building Type: Industrial

Wetlands involvement:

None

## Contacts

### Locals involved:

Daniel Marques, ARF Davidson, Main Street, Whitinsville, MA 01588  
Spaulding R. Aldrich, LHWC, Memorial Town Hall, Whitinsville, MA 01588

### Other environmental or health agencies:

### Publicity (Media or Political)

## Enforcement

### Is the generator or responsible party known? (Give details)

ATF Davidson (White Consolidated Industries) is the responsible party.

When last inspected? 12/8/82

By who? John F. Kronopolus

### Status of Enforcement:

Are Orders outstanding? Are timetables being met?

### New proposed actions:

## Comments:

This site is currently under investigation by Central Region Staff to determine extent of on site contamination and what impact this may have on the environment.

ENVIRONMENTAL PROTECTION AGENCY  
NOTIS DATA MANAGEMENT SYSTEM

NOTIS REPORT #4

LISTING BY FACILITY  
REGION: 01 STATE: MA

PAGE: 10  
REPORT DATE: 02/17/82

NOTIFICATION ID NO.	SITE NAME SITE STREET SITE CITY SITE COUNTY EPA SITE ID NO.	REQUIRED NOTIFIER NAME REQUIRED NOTIFIER STREET REQUIRED NOTIFIER CITY (CONTACT NAME/TITLE) (CONTACT PHONE)	NOTIFIER STATUS (PRES OWN, PAST OWN PRES OP, PAST OP TRANSPORTER, VOLUNTEER)
MAS000001112	ATF DAVIDSON MAIN ST WHITINSVILLE 01588 WORCESTER MAD980520639	AFT DAVIDSON MAIN ST WHITINSVILLE MA 01588 (MARQUES, DANIEL /MNGR FACIL ) (617-234-7451)	PRES OWN

RELEASES TO THE ENVIRONMENT: LIKELY

DATES OF WASTE HANDLING: 1930 TO 1965

WASTE AMOUNT: 0

AREA: 0

MAP PRESENT: NO

FORM TYPE: 8900-1

NOTIF. POSTMARKED DATE: 81/06/09

SIGNATURE PRESENT: YES

DATE OF LAST UPDATE: 82/02/05

TYPE OF FACILITY

TYPES OF WASTES

SOURCES OF WASTE

OTHER-(SEE COMMENTS)

SPENT BATH SOLU FM ELECTROPLATING OPER  
SLUDGES FM BOTTOM OF BATH FM ELECTRPLTING OPER  
SPENT STRIP & CLEAN BATH SOLU FM ELECTRPLTING OPER

COMMENTS

SEQ NO.

WASTE WATER DISCHARGED INTO RIVER  
UNTIL 1965  
BOTTOM MUMFORD RIVER

1  
2  
600

ENVIRONMENTAL PROTECTION AGENCY  
NOTIS DATA MANAGEMENT SYSTEM

PAGE: 11

NOTIS REPORT #4

LISTING BY FACILITY  
REGION: 01 STATE: MA

REPORT DATE: 02/17/82

NOTIFICATION ID NO.	SITE NAME SITE STREET SITE CITY SITE COUNTY EPA SITE ID NO.	REQUIRED NOTIFIER NAME REQUIRED NOTIFIER STREET REQUIRED NOTIFIER CITY (CONTACT NAME/TITLE) (CONTACT PHONE)	NOTIFIER STATUS (PRES OWN, PAST OWN PRES OP, PAST OP TRANSPORTER, VOLUNTEER)
MAS000001113	ATF DAVIDSON MAIN ST WHITINSVILLE 01588 WORCESTER MAD980520639	AFT DAVIDSON MAIN ST WHITINSVILLE MA 01588 (MARQUES, DANIEL /MNGR FACIL ) (617-234-7451)	PRES OWN

RELEASES TO THE ENVIRONMENT: NONE

DATES OF WASTE HANDLING: 1930 TO 1979

WASTE AMOUNT: 40,000 CU FT AREA: 730,000 SQ FT MAP PRESENT: NO FORM TYPE: 8900-1

NOTIF. POSTMARKED DATE: 81/06/09 SIGNATURE PRESENT: YES DATE OF LAST UPDATE: 82/02/05

TYPE OF FACILITY

TYPES OF WASTES

SOURCES OF WASTE

LANDFILL

ELECTROPLATING TREAT SLUDGE  
SALT BATH POT CLEANING SOLU FM METAL HEAT TREAT OPER

COMMENTS

SEQ NO.

SITE USED FOR TEXTILE PRODUCTION  
SAND DEPOSITED ADJECNT TO PLANT

1  
2

ENVIRONMENTAL PROTECTION AGENCY  
NOTIS DATA MANAGEMENT SYSTEM

PAGE: 10

NOTIS REPORT #4

LISTING BY FACILITY  
REGION: 01 STATE: MA

REPORT DATE: 02/17/82

NOTIFICATION ID NO.	SITE NAME SITE STREET SITE CITY SITE COUNTY EPA SITE ID NO.	REQUIRED NOTIFIER NAME REQUIRED NOTIFIER STREET REQUIRED NOTIFIER CITY (CONTACT NAME/TITLE) (CONTACT PHONE)	NOTIFIER STATUS (PRES OWN, PAST OWN PRES OP, PAST OP TRANSPORTER, VOLUNTEER)
MAS000001112	ATF DAVIDSON MAIN ST WHITINSVILLE 01588 WORCESTER MAD980520639	AFT DAVIDSON MAIN ST WHITINSVILLE MA 01588 (MARQUES, DANIEL /MNGR FACIL ) (617-234-7451)	PRES OWN

RELEASES TO THE ENVIRONMENT: LIKELY

DATES OF WASTE HANDLING: 1930 TO 1982

WASTE AMOUNT: 0

AREA: 0

MAP PRESENT: NO

FORM TYPE: 8900-1

NOTIF. POSTMARKED DATE: 81/06/09

SIGNATURE PRESENT: YES

DATE OF LAST UPDATE: 82/02/05

TYPE OF FACILITY

TYPES OF WASTES

SOURCES OF WASTE

OTHER-(SEE COMMENTS)

SPENT BATH SOLU FM ELECTROPLATING OPER  
SLUDGES FM BOTTOM OF BATH FM ELECTRPLTING OPER  
SPENT STRIP & CLEAN BATH SOLU FM ELECTRPLTING OPEP

COMMENTS

SEQ NO.

WASTE WATER DISCHARGED INTO RIVER  
UNTIL 1985/1982  
BOTTOM MUMFORD RIVER

1  
2  
600

ENVIRONMENTAL PROTECTION AGENCY  
NOTIS DATA MANAGEMENT SYSTEM

OTIS REPORT #4

LISTING BY FACILITY  
REGION: 01 STATE: MA

PAGE: 11  
REPORT DATE: 02/17/82

NOTIFICATION ID NO.	SITE NAME SITE STREET SITE CITY SITE COUNTY EPA SITE ID NO.	REQUIRED NOTIFIER NAME REQUIRED NOTIFIER STREET REQUIRED NOTIFIER CITY (CONTACT NAME/TITLE) (CONTACT PHONE)	STATE ZIP	NOTIFIER STATUS (PRES OWN, PAST OWN PRES OP, PAST OP TRANSPORTER, VOLUNTEER)
------------------------	---	---	--------------	--

MAS000001113	ATF DAVIDSON MAIN ST WHITINSVILLE WORCESTER MA0980520639	AFT DAVIDSON MAIN ST WHITINSVILLE (MARQUES, DANIEL /MNGR FACIL (617-234-7451)	MA 01588	PRES OWN
--------------	--	---	-------------	----------

RELEASES TO THE ENVIRONMENT: NONE

DATES OF WASTE HANDLING: 1930 TO 1979

WASTE AMOUNT: 40,000 CU FT AREA: 730,000 SQ FT MAP PRESENT: NO FORM TYPE: 8900-1

NOTIF. POSTMARKED DATE: 81/06/09 SIGNATURE PRESENT: YES DATE OF LAST UPDATE: 82/02/05

TYPE OF FACILITY

TYPES OF WASTES

SOURCES OF WASTE

LANDFILL

ELECTROPLATING TREAT SLUDGE  
SALT BATH POT CLEANING SOLU FM METAL HEAT TREAT OPER

COMMENTS

SEQ NO.

SITE USED FOR TEXTILE PRODUCTION  
SAND DEPOSITED ADJECNT TO PLANT

1  
2

MEMORANDUM

COPY

SUBJECT: A.T.F. Davidson Company  
Change in Status from TSD-G  
to Generator Status

TO: Linda Benevides  
FROM: Dick Johnson  
DATE: Septmeber 28, 1982

On September 16, 1982 an inspection was conducted at A.T.F. Davidson Company, located on Main Street, Whitnsville, Massachusetts.

A.T.F. Davidson Company requested a change in TSD Status to Generator as a direct result of Consolidation and Economic reasons; also they are in the process of selling certain sections of the factories, such as the plating and steel fabricating buildings. A.T.F. Davidson is aware of the fact that all hazardous waste must be shipped off premises within ninety (90) days after accumulation of 1000 kg.

I would recommend the request from A.T.F. Davidson Company be approved to Generator Status.

JAD/DJ:bk



Now do not want to  
Change

J.K.

Site ID # MAP 046128559

Part A Application Yes      No     

RCRA INSPECTION CHECKLIST

Site Name: ATF Davidson Inspection Date: Sept. 16, 1982

Site Location: Main St. Whitesville Type of Facility: Graphic Mach Mfg

Generator: ✓

Phone No: (617) 234-7451

Transporter:     

Inspectors:      TSD:     

EPA:     

Permits Issued:     

State: Richard Johnson

Industry: Mr Marques  
Facilities & Energy Mgr.

In Compliance Yes      No     

I. Generator with Temp. Storage or TSD Facility

A. Pre-Inspection Meeting

1. General Information (Process Description, etc.)

Graphic Arts equipment purchase casting from  
other company, machining paint assemble and ship

ATF Davidson requests change in TSD - Gen. Status  
To Generator Status only

A.T.F. Davidson company representative Mr Marques  
states he would not be generating more than  
1012-55 gallons drums of waste per month



2. Hazardous Waste Profile

Type of Waste	Amt. of Waste kg/mo	Onsite Temp. Storage/ TSD	Transporter	Offsite TSD
---------------	------------------------	---------------------------------	-------------	----------------

45 → 55 gal <sup>drums</sup> Nickel Sludge ~~Monthly~~

Waste Oils 8- 55 gal. drums Monthly

McDonald & Watson Waste Oil Co

Sittuate R.I. Peep Toad Rd

1-401 934-0331

Interex Takes Sludges

This hazardous waste accumulated for some time because  
H. ATF Davidson Co TSD STATUS because of consolidation

A minimal amount of waste 2-55 gal drums may be generated

3. Records

262.21 a.) Manifest

Manifests may be checked ahead of time by state personnel who have them on file - otherwise, random selection of some during inspection for review. Must be kept for 3 years.

- 1) Document No.: MA 0077897
- 2) Generator ID, MAD046128559  
name, address: ATF Davidson, Main St, Whitinsville Ma
- 3) Transporter(s) ID, MAD980523203 <sup>notic/c</sup>  
name, address: Chemical Waste Management 5 Strathmore Rd
- 4) TSD Facility ID,  
name, address: \_\_\_\_\_
- 5) Waste Type of Quantity: 45-55 gal. drums Nickel Sludge
- 6) Date of Acceptance: 9-3-82

262.50 i) International Shipping Manifest: \_\_\_\_\_

262.42 ii) Exception Report: \_\_\_\_\_

265.13 b.) Waste Analysis Plan

1. Plan on site: \_\_\_\_\_
2. Plan should include (a) parameters: \_\_\_\_\_  
(b) test methods: \_\_\_\_\_  
(c) sampling method: \_\_\_\_\_  
(d) frequency: \_\_\_\_\_
3. Copy of Results \_\_\_\_\_

265.15 c.) Inspection Schedule and log

- 1) Are inspections conducted yes
- 2) Written inspection schedule no
- 3) Inspection Log no

- (A) Daily - loading and unloading of areas subject to spills: \_\_\_\_\_  
- discharge control equipment in tanks: \_\_\_\_\_  
- incinerator system, thermal treatment equipment, \_\_\_\_\_  
- chem/phys/biol treatment equipment: \_\_\_\_\_  
- freeboard level of surface impoundments: \_\_\_\_\_
- (B) \* Weekly - physical conditions of containers: \_\_\_\_\_  
- " tanks: \_\_\_\_\_  
- " surface impoundments: \_\_\_\_\_  
- " chem/phys/bio. treatment facility: \_\_\_\_\_

265.16 \*d.) Personnel Training Records

- 1.) Job titles/position descriptions and name of employee  
Mr. Marques Facilities & Energy Manager
- 2.) Description of training: Attended EPA Seminars Intek
- 3.) Records of Training: \_\_\_\_\_
- 4.) Training completed: \_\_\_\_\_

\*e.) Contingency Plan

- 265.53 1. Plan on site:
- 265.53 2. Plan to local authorities:
- 265.52 3. Content of Plan:
- a) Emergency plan:
- b) Local authority arrangements:
- c) Identify emergency coordinator: Mr Daniel Marques
- d) List of emergency <sup>equipment</sup> plans:
- e) Evacuation plans:

f.) Closure and Post-closure Plans; Cost Estimates

- 265.112, .113, .114, .115 1. Closure Plan (TSD Facilities) -
- a) Plan on site:
- b) Does plan include:
- 1) Schedule of partial closure if applicable:
- 2) Estimate of maximum inventory of waste in storage or treatment at given time:
- 3) Schedule for final closure & an estimate of the expected year of closure:
- 4) Description of steps needed to decontaminate facility equipment:
- 5) Total time required for closure:
- 6) Certification of closure:
- 265.117, .118 2. Post-closure Plan (disposal facilities only)
- a) Plan on site:
- b) Does plan identify and include frequency of:
- o planned ground water monitoring:
- o planned maintenance & security activities:
- o name, address and phone number of Post-closure contact:
- c) Length of Post-closure period identified:

265.142

3. Closure Cost Estimate (TSD facilities)

- a) Estimate on site: Amount of estimate:
- b) Estimate adjusted annually on 11/19 for inflation:
- c) Has Closure Plan changed?
- d) If answer to 3 is yes, has cost estimate changed?

265.144

4. Post-closure Cost Estimate (disposal facilities only)

- a) Estimate on site: Amount of estimate:
- b) Estimate adjusted annually on 11/19 for inflation:
- c) Has Post-closure plan changed?
- d) If answer to 3 is yes, has cost estimate changed?

265.73

g) Operating Records

- 1. Records on site \_\_\_\_\_
- 2. Description, quantity, method and dates of disposal: \_\_\_\_\_  
\_\_\_\_\_
- 3. Location onsite and manifest number: \_\_\_\_\_  
\_\_\_\_\_
- 4. Results of waste analysis: \_\_\_\_\_
- 5. Record of any incidents requiring use of contingency plan: \_\_\_\_\_  
\_\_\_\_\_
- 6. Records and results of inspections: \_\_\_\_\_
- 7. Closure and post-closure cost estimates if needed: \_\_\_\_\_

B. Inspection

265.14

1. Site Security

- a) 24 hour surveillance system: yes
- b) or Artificial or natural barrier: yes
- c) and Means to control entry: yes
- d) Danger sign posted at each entrance legible at 25': yes

265.30-.37

**\*\*2. Site Preparedness/Prevention**

- a) Internal communication/alarm: yes
- b) Telephone/2-way radio: \_\_\_\_\_
- c) Portable fire control equipment: yes
- d) Adequate water for fire control: yes
- e) Testing and Maintenance of equipment: yes
- f) Adequate aisle space: yes
- g) Access to equipment: good

265,170-.177

**3. Containers**

Leaks \_\_\_\_\_

Ruptures \_\_\_\_\_

Corrosion \_\_\_\_\_

Closed Except in use \_\_\_\_\_

Heat/Pressure \_\_\_\_\_

50' bufferzone for I and R wastes:

I = Ignitable \_\_\_\_\_; R = Reactive \_\_\_\_\_

No smoking signs near I or R waste \_\_\_\_\_

Separation of incompatible wastes \_\_\_\_\_

Evidence of spills \_\_\_\_\_

262.30-.34

Pretransport requirements: packaging \_\_\_\_\_

labelling \_\_\_\_\_

marking \_\_\_\_\_

placarding \_\_\_\_\_

Date of Waste Accumulation \_\_\_\_\_

\*NYR Check for impermeable base under containers, any drains, secondary containment

\*NYR - Not yet regulated

\*\*Required for Temporary Storage

265.190-.199

4. Tanks

Leaks \_\_\_\_\_

Ruptures \_\_\_\_\_

Corrosion: Check valves, piping controls for signs of corrosion \_\_\_\_\_

> 2' freeboard or containment \_\_\_\_\_

Heat/pressure \_\_\_\_\_

Evidence of spills \_\_\_\_\_

Inflow and outflow controls \_\_\_\_\_

Continuous Inflow \_\_\_\_\_ Means to stop flow? \_\_\_\_\_

Special Requirements for I and R wastes \_\_\_\_\_

265.220-.230

5. Surface Impoundments (Pits, Ponds and lagoons)

Protective Cover on Dikes \_\_\_\_\_

> 2' freeboard \_\_\_\_\_

Special requirements for I and R waste \_\_\_\_\_

Evidence of fire, explosion - leak \_\_\_\_\_

\*NYR Liner \_\_\_\_\_

265.90-.94

\*\*Groundwater Monitoring \_\_\_\_\_

265.250-.257

6. Waste Piles

Wind erosion control \_\_\_\_\_

\*\*Prevention of leachate from pile (if hazardous) \_\_\_\_\_

Special requirements for I and R waste \_\_\_\_\_

Evidence of fire, explosion, leak \_\_\_\_\_

Separation of incompatible wastes \_\_\_\_\_

Waste analysis \_\_\_\_\_

\*NYR - Not yet regulated

\*\*November 19, 1981

265.340  
265.382

7. Incinerators/Thermal Treatment

- a) Steady State conditions \_\_\_\_\_
- b) Inspect combustion and emission control instruments  
every 15 minutes \_\_\_\_\_
- c) Observe stack plume hourly \_\_\_\_\_
- d) Waste analysis:
  - 1) Heating value of waste \_\_\_\_\_
  - 2) Organic halogen content \_\_\_\_\_
  - 3) Sulfur content \_\_\_\_\_
  - 4) Lead concentrations \_\_\_\_\_
  - 5) Mercury concentrations \_\_\_\_\_
- e) Evidence of leaks of spills (pumps, valves, conveyors  
and pipes) \_\_\_\_\_
- f) Daily Inspection of Emergency shutdown controls and Alarm  
systems \_\_\_\_\_
- g) Special Requirements for incompatible wastes \_\_\_\_\_

265.272 -  
265.282

8. Phys/Chem/Bio. Treatment

- a) Leaks \_\_\_\_\_
- b) Ruptures \_\_\_\_\_
- c) Corrosion \_\_\_\_\_
- d) Waste cut off \_\_\_\_\_
- e) Waste analysis \_\_\_\_\_
- f) Special Requirements for I and R waste \_\_\_\_\_
- g) Special Requirements for incompatible wastes \_\_\_\_\_

265.272 -  
265.282

9. Land Treatment

- a) Approval document \_\_\_\_\_
- \*b) Run-on diversion \_\_\_\_\_
- \*c) Run-off collection; Treat if necessary \_\_\_\_\_
- d) Waste Analysis \_\_\_\_\_
- e) Presence of food chain crops, if so, refer to 265.276 \_\_\_\_\_
- f) Unsaturated zone monitoring plan \_\_\_\_\_
- g) Unsaturated zone waste analysis \_\_\_\_\_
- h) Records of application dates, rates, quantities and location of waste \_\_\_\_\_
- i) Special requirements for I and R wastes \_\_\_\_\_
- j) Special requirements for incompatible wastes \_\_\_\_\_
- \*k) Groundwater Monitoring \_\_\_\_\_

265.90-.94

265.302-.315

10. Landfills

- \*a) Run-on diversion \_\_\_\_\_
- \*b) Run-off collection; Treat if necessary \_\_\_\_\_
- c) Wind dispersion controlled \_\_\_\_\_
- d) Records of all dimensions, locations, and contents \_\_\_\_\_
- e) Special Requirements for I and R wastes \_\_\_\_\_
- f) Special Requirements for Incompatible Wastes \_\_\_\_\_
- \*g) Special Requirements for liquids \_\_\_\_\_
- \*h) Reduction in volume of empty containers \_\_\_\_\_
- \*i) Groundwater Monitoring \_\_\_\_\_

265.90-.94

Subpart R

11. Underground Injection

Consult appropriate subparts.



C. Requests for Information

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D. Photos Taken

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E. Sampling Inspection Needed

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F. Potential for Imminent Hazard, Air, or Water Discharge Violations

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G. Proximity to Residential Area, Surface Water, Recharge Zone, etc.

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MEMORANDUM

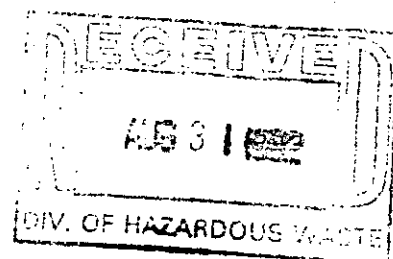
TO: ~~DREE~~, John Kronopolous, Central Region, DTHW  
FROM: Linda Benevides *LB*  
DATE: 9/8/82  
SUBJECT: Requests to amend Part A (Facility) Permit Applications (one additional request) - ATF Davidson

Attached are the above-mentioned requests forwarded to us by the EPA. These companies have had some change in status which they want to have reflected in their EPA notification or on their Part A application. Some of these changes are minor and may reflect an error in their original submittal. However, some of the changes eg. from facility status to generator, company no longer in business, a disposal facility that requires closure, etc., may require a follow-up by phone or through an inspection. I am forwarding all requests to you for your information and decision.

Please let me know which changes your office feels can go through at EPA and which changes you would like to investigate. I will call your office next week to check the status of these determinations.

LB/jm

August 27, 1982



Mr. Glen Gilmore  
The Commonwealth of Massachusetts  
Department of Environmental Quality  
Engineering  
Division of Hazardous Waste  
1 Winter Street  
8th Floor  
Boston, MA 02108

Dear Mr. Gilmore:

ATF-Davidson Company is at present the holder of a hazardous waste permit No. MAD046128559. It is hereby requested that this permit be terminated.

The ATF-Davidson Company is in the process of consolidating its entire manufacturing activity into a one-floor operation, one building. This consolidation and manufacturing process change will furnish us with total control over the generation of waste which will be at a minimum level.

If additional information is required to expedite the termination of the above permit, please contact the ATF-Davidson Company's Facilities and Energy Manager, Daniel Marques, Tel. No. (617)-234-7451, Ext. 218.

Your cooperation and an early decision on the above subject will be appreciated.

Sincerely,

ATF-DAVIDSON COMPANY

A handwritten signature in cursive script, appearing to read "D. Marques".

Daniel Marques  
Facilities & Energy Mgr.

DM:lk

attachment



U.S. ENVIRONMENTAL PROTECTION AGENCY  
**ACKNOWLEDGEMENT OF APPLICATION  
FOR A HAZARDOUS WASTE PERMIT**

This is to acknowledge that the Environmental Protection Agency has received: (1) A notification pursuant to Section 3010 of the Resource Conservation and Recovery Act for the facility with the EPA Identification Number shown on the front of this postcard; and (2) Part A of a Hazardous Waste Permit Application for that facility, including a signed statement that the operation of the facility, or its construction, began prior to November 19, 1980. While the information provided by these submissions has not been fully reviewed for completeness or accuracy, EPA will accept this information as an initial qualification for interim status pursuant to Section 3005 of the Act. If after further review of this information, EPA determines that the owner or operator did not fulfill all the requirements for interim status, EPA may treat the owner or operator as not having qualified for interim status pursuant to that section and will advise the owner or operator of that determination. Facility owners and operators with interim status must comply with the standards set forth at 40 CFR Part 265 until a permit is issued. Interim status may be terminated if the owner or operator fails to furnish any additional information requested by EPA in order to process a permit application.

EPA Form 3510-3A (12-80)



**ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

•MAD046128559

ATP-DAVIDSON CO INC  
MAIN ST  
WHITINSVILLE

PA 01568

INSTALLATION ADDRESS

MAIN ST  
WHITINSVILLE

PA 01568

To: John Desmond

From: Carol de Groot.

Re: ATF Davidson, Northbridge -

Date: May 1, 1982

On April 24, 1985 a site inspection of ATF Davidson Co. in Northbridge, MA was performed by Susan Corderman + Carol de Groot. The purpose of this inspection was to check on a recent report of an oil sheen on the Mumford River <sup>near</sup> ~~which runs through~~ the ATF Davidson property as well as to <sup>CERCLA-notified</sup> tour the portions of the property <sup>currently</sup> being

assessed. ~~under~~ ~~ATF~~ Company representative

Richard Hill from White Consolidated Industries,

Inc. (Cleveland, Ohio corporate headquarters) was

present as was Daniel Marques, ATF Davidson's

Manager of Facilities + Energy and Philip Whitney

of ATF Davidson.

## PART B: GENERATOR'S COPY

*mailed to Boston 11/5  
Bureau of Waste*

GENERATOR EPA ID NO.

MA 004612855

TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION OF  
DELIVERY AND NON-TAMPERING WITH SHIPMENT-ALSO PRINT SIGNATURETRANSPORTER NO. 2 SIGNATURE AND CERTIFICATION  
OF RECEIPT OF SHIPMENT-ALSO PRINT SIGNATURE

TRANSPORTER NO. 2 SWA REGISTRATION NO.

DATE DELIVERED

10 23 81  
MO. DAY YR.

DATE RECEIVED

MO. DAY YR.

DATE DELIVERED

Form VHW-001 (10/80)

STATE OF NEW JERSEY  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
HAZARDOUS WASTE MANIFEST

Please TYPE all information.

## PART A: GENERATOR'S COPY

DOCUMENT NO.

NJ 0067638

GENERATOR NAME

A.T.F. Davidson Co.

PHONE (INCLUDE AREA CODE)

617-234-7451

EPA ID NO.

MA 004612855

ADDRESS (STREET - CITY - STATE - ZIP CODE)

Main St. Whitinsville Mass 01588

TRANSPORTER NO. 1

ENVIRONMENTAL TRANSFER CORP

PHONE (INCLUDE AREA CODE)

201-539-7111

EPA ID NO.

NJ 000002938

ADDRESS (STREET - CITY - STATE - ZIP CODE)

52. Speedwell Ave Morris Plains N.J.

TRANSPORTER NO. 2

PHONE (INCLUDE AREA CODE)

EPA ID NO.

ADDRESS (STREET - CITY - STATE - ZIP CODE)

TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY

EMERGENCY TECHNICAL SERVICE CORP

PHONE (INCLUDE AREA CODE)

201-697-4424

EPA ID NO.

NJ 000006920

SITE ADDRESS (STREET - CITY - STATE - ZIP CODE)

RD 515 VERNON N.J.

IF MORE THAN TWO TRANSPORTERS ARE TO BE UTILIZED, FILL OUT THE FOLLOWING AS APPROPRIATE

THIS FORM IS NO. 1 OF A TOTAL OF 1 THE FIRST MANIFEST DOCUMENT NO. IS NJ

PROPER US DOT  
SHIPPING NAMEUS DOT  
HAZARD CLASSUN  
NUMBER

FORM

NET  
QUANTITY

UNITS

CONTAINERS

NO.

TYPE

EPA  
HAZ  
CODEEPA  
WASTE TYP

1. WASTE PICKLE ACID (WEI)	Flammable Solid	NA1344	2	0.01.3	3	001	07	R	000
2.									
3.									
4.									
5.									
6.									

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION OF ADDITIONAL WASTES INCLUDED IN SHIPMENT OF A NONHAZARDOUS NATURE WHICH DO NOT HAVE TO BE MANIFESTED)

GENERATOR'S CERTIFICATION: This is to certify that the above named materials are properly classified, described, packaged, marked and labelled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, U.S. EPA and the State. The wastes described above were consigned to the Transporter named, The Treatment, Storage or Disposal Facility can and will accept the shipment of hazardous waste, and has valid permit to do so. I certify that the foregoing is true and correct to the best of my knowledge.

GENERATOR'S SIGNATURE - ALSO PRINT SIGNATURE

DANIEL MARQUES  
Daniel Marques

TITLE

DATE SHIPPED

10 22 81  
MO. DAY YR.

EXPECTED ARRIVAL DATE

10 23 81  
MO. DAY YR.TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION  
OF RECEIPT OF SHIPMENT - ALSO PRINT SIGNATURE

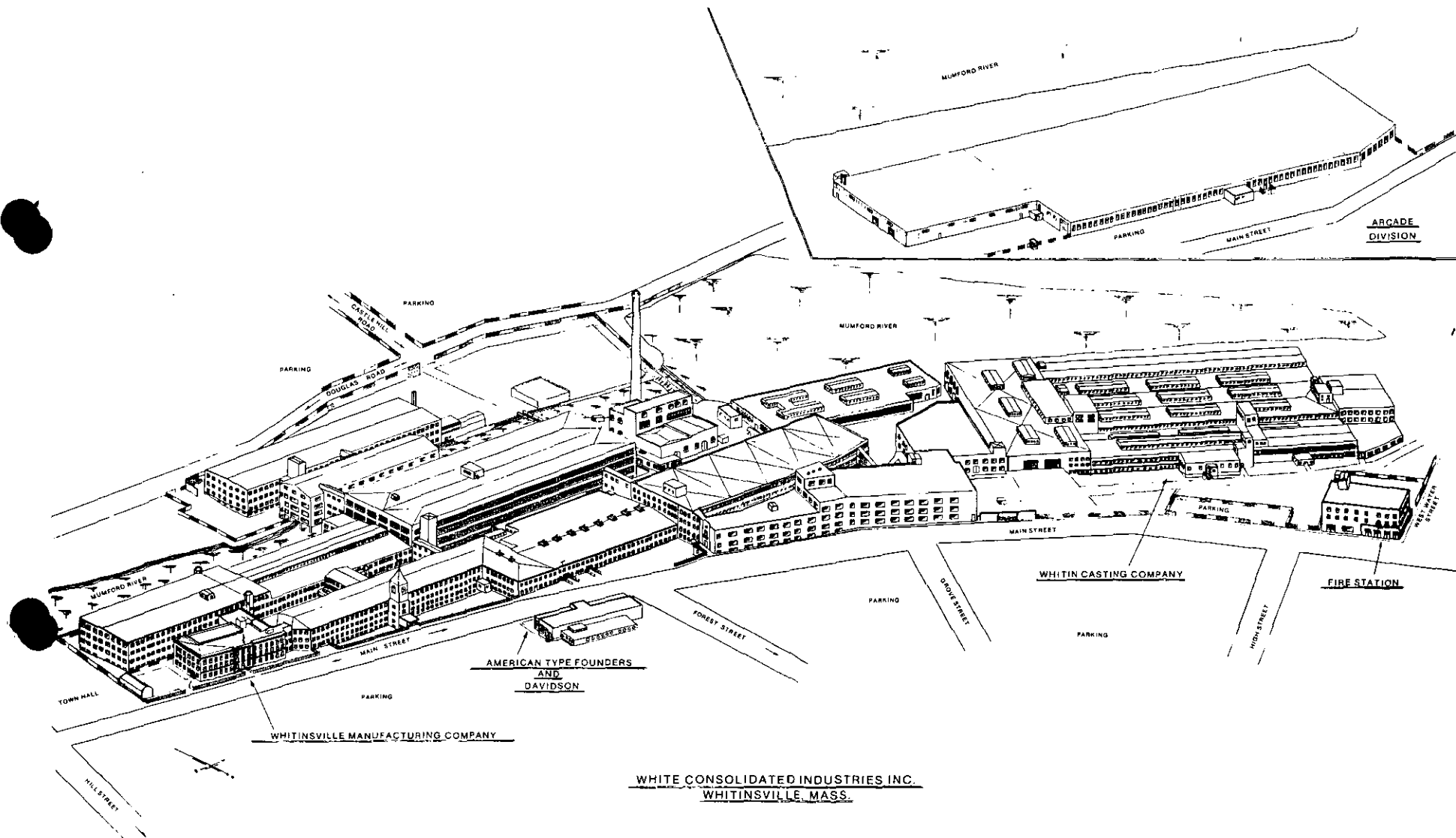
A.T.F. Davidson Co.

TRANSPORTER NO. 1 SWA REGISTRATION NO.

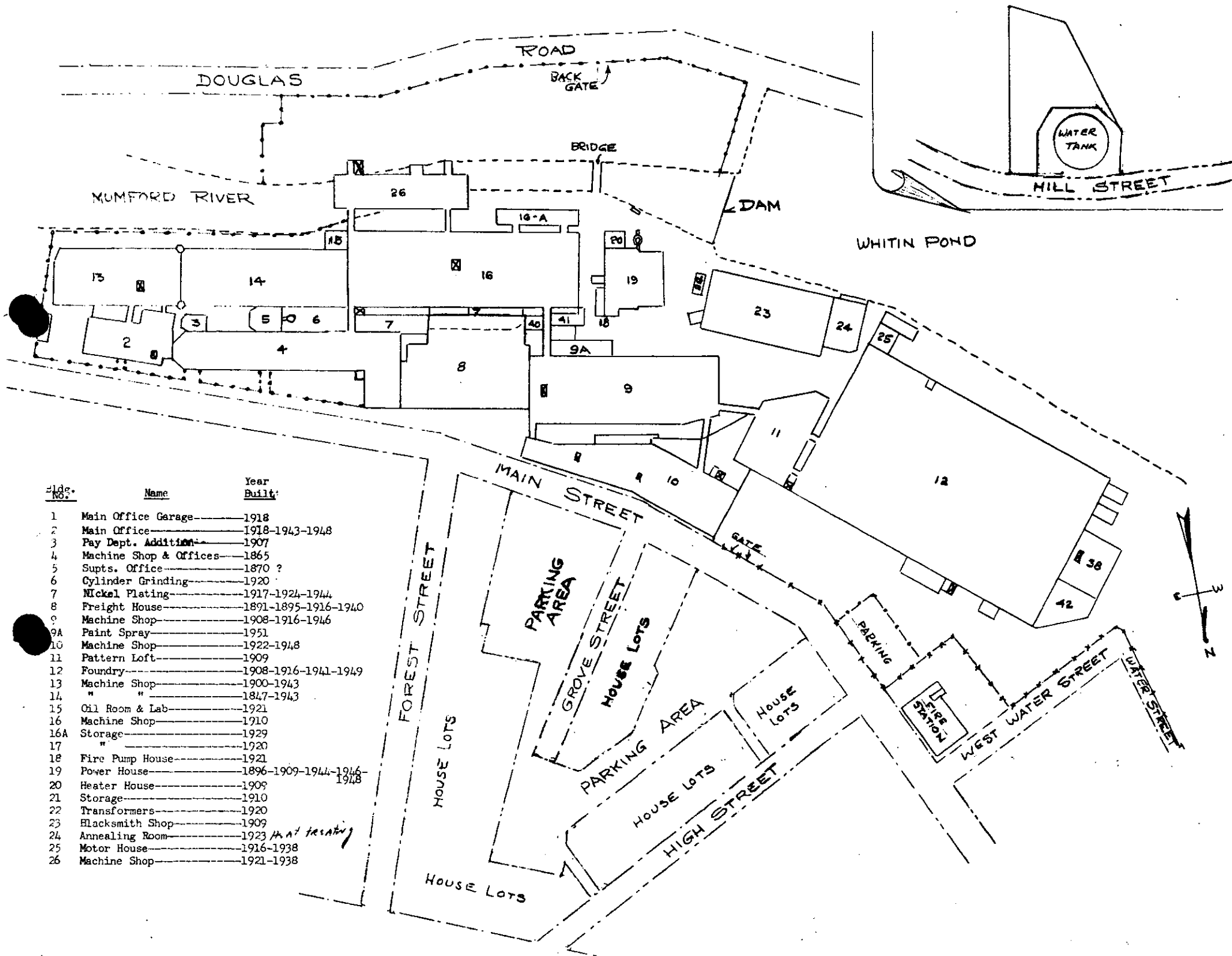
NJ SWA 56321AT

DATE RECEIVED

10 22 81  
MO. DAY YR.







Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

810609

REQ.

ATF Davidson

Size: Main Street

City Whitinsville, State MA Zip Code 01588

Name of Site ATF Davidson

Street Main Street

CITY Whitinsville COUNTY Worcester, MA ZIP CODE 01588

Name (Last, First and Title) Marques, Daniel, Mgr of Facilities

Phone (617) 234-7451

From (Year) 1930 To (Year) 1965

**Option 2:** This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 regulations (40 CFR Part 261).

Place an X in the appropriate boxes.

1. ☐ Organics
2. ☐ Inorganics
3. ☐ Solvents
4. ☐ Pesticides
5. ☐ Heavy metals
6. ☐ Acids
7. ☐ Bases
8. ☐ PCBs
9. ☐ Mixed Municipal Waste
10. ☐ Unknown
11. ☐ Other (Specify)

1. ☐ Mining
2. ☐ Construction
3. ☐ Textiles
4. ☐ Fertilizer
5. ☐ Paper/Printing
6. ☐ Leather Tanning
7. ☐ Iron/Steel Foundry
8. ☐ Chemical, General
9. ☐ Plating/Polishing
10. ☐ Military, Ammunition
11. ☐ Electrical Conductors
12. ☐ Transformers
13. ☐ Utility Companies
14. ☐ Sanitary Refuse
15. ☐ Photofinish
16. ☐ Lab/Hospital
17. ☐ Unknown
18. ☐ Other (Specify)

EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.

F007
F008
F009

[illegible]


UNCONTROLLED WASTE SITES  
AND HAZARDOUS MATERIALS DIV.

JUN 1 1 1981

Notification of Hazardous Waste Site	Side Two	
<b>F Waste Quantity</b> Place an X in the appropriate boxes to indicate the facility types found at the site. In the "total facility waste amount" space give the estimated combined quantity (volume) of hazardous wastes at the site using cubic feet or gallons. In the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.	<b>Facility Type</b> 1 <input type="checkbox"/> Piles 2 <input type="checkbox"/> Land Treatment 3 <input type="checkbox"/> Landfill 4 <input type="checkbox"/> Tanks 5 <input type="checkbox"/> Impoundment 6 <input type="checkbox"/> Underground Injection 7 <input type="checkbox"/> Drums, Above Ground 8 <input type="checkbox"/> Drums, Below Ground 9 <input type="checkbox"/> Other (Specify) _____	<b>Total Facility Waste Amount</b> Cubic feet: <u>unknown</u> Gallons: _____ <b>Total Facility Area</b> Square feet: <u>unknown</u> Acres: _____ <u>bottom Mumford River</u>

**G Known, Suspected or Likely Releases to the Environment:**

Place an X in the appropriate boxes to indicate any known, suspected, or likely releases of wastes to the environment.

☐ Known ☐ Suspected ☒ Likely ☐ None

Note: Items H and I are optional. Completing these items will assist EPA and State and local governments in locating and assessing hazardous waste sites. Although completing the items is not required, you are encouraged to do so.

**H Sketch Map of Site Location: (Optional)**

Sketch a map showing streets, highways, routes or other prominent landmarks near the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide a publishing map showing the site location.

**I Description of Site: (Optional)**

Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.

discharge of untreated electroplating wastewater to river was discontinued with the installation of a wastewater treatment plant in 1965. It is believed that the quantity of material disposed was small compared to the size of the Mumford River. The concentration of metals in the wastewater was relatively low and since this disposal ceased 16 years ago, it is highly unlikely that any measurable levels remain in the river.

**J Signature and Title:**

The person or authorized representative (such as plant managers, superintendents, trustees or attorneys) of persons required to notify must sign the form and provide a mailing address (if different than address in item A). For other persons providing notification, the signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify. If you are not required to notify check "Other".

Name: Richard C. Bryan, President  
Street: ATF-DAVIDSON COMPANY  
Main Street  
City: Whitinsville State: Mass Zip Code: 01588  
Signature: [Signature] Date: 6-9-81

☒ Owner, Present  
☐ Owner, Past  
☐ Transporter  
☐ Operator, Present  
☐ Operator, Past  
☐ Other

MEMORANDUM

SUBJECT: Surface Impoundment Inspection,  
A.T.F. Davidson Co., Inc. Northbridge

TO: Ed Benoit

FROM: Stan Szczurko Jr.

*filed - Whitinsville, MA*

DATE: January 19, 1981

An inspection on the above subject facility was made by the writer on January 8, 1981. Accompanying the writer was Mr. Joseph Rosol, Plant Engineer for A.T.F.

Mr. Rosol pointed out that there had been two distinct areas, which the company owned and filled in the past. The first one located across the Mumford River off Douglas Avenue, had been a marsh. Fly ash had been used to fill in this 2 acre parcel. This site has been filled in and abandoned since 1950. The area has been graded, a vegetative growth covers the site and no leachate or runoff could be noticed.

A second area of approximately 5 to 7 acres is located on Main Street adjacent to the Whittin Casting Company. This particular site had been part of the Mumford River but had been filled since the 1890's. Mr. Rosol could only offer his knowledge of the material used for fill which was, gravel, excavation fill, building debris, fly ash and other ash resulting from coal fired furnaces and boilers. A small pond approximately 20' X 50' still exists but has not been filled because of current wetland regulations.

Both these sites appeared not to pose any environmental hazard but during this inspection the pond had been frozen and snow covered the area. As a result the writer suggests; 1 - a follow-up inspection in the spring during more favorable weather conditions; 2 - obtain water quality analysis from the Division of Water Pollution Control, water quality and research sections in Westborough for the Mumford River; 3 - if after steps 1 and 2 above indicate some adverse impacts on the receiving water then further groundwater and/or soil analysis should be considered.

All potable water is supplied by the Town and from all indications from Mr. Rosol there water supplies are surface and located upstream of the site location.

DATE PREPARED												U.S. ENVIRONMENTAL PROTECTION AGENCY SURFACE IMPOUNDMENT ASSESSMENT (SIA) OPERATIONAL FEATURES OF THE IMPOUNDMENT AND GROUND-WATER CONTAMINATION POTENTIAL SECTION II																								SERIAL NUMBER 000080																																			
MONTH DAY YEAR												INSTRUCTIONS: This form is to be completed for one impoundment per site (facility) identified in Section I, Location and Count of Impoundments Form or for one impoundment per site selected via random sampling procedures. Complete multiple choice questions by entering the code number preceding the appropriate answer.																																																											
75 76 77 78 79 80																																																																							
I. FACILITY IDENTIFICATION																								II. PURPOSE OF IMPOUNDMENT (Enter no. in block 23)																																															
STATE		CNTY./CITY		PLACE				CATEGORY		SIA SITE NUMBER				IMPOUND- MENT NO.		1. Waste Storage 2. Waste Disposal 3. Waste Treatment (Specify below) 4. Other (Specify below)																																																							
														1		SPECIFY																																																							
1 2		3 - 5		6 - 10				11 - 13		14 - 18				19 - 21		22		23 24 - 34																																																					
III. IMPOUNDMENT DESCRIPTION																																																																							
a. Age of impoundment in years.						b. IS IMPOUNDMENT PRESENTLY USED? 1. Yes 2. NO						c. If answer to II.b is 'yes', give no. of years in operation.						d. If answer to III.b is 'no', give last year of operation.						e. Surface area of impoundment. (in acres)						f. Surface area of all impoundments at this site (in acres).						g. Average influent into this impoundment (gallons per day and year of record).																																			
																																				2 GALS./DAY												YEAR OF RECORD																							
35 36						37						38 39						40 - 43						44 - 49						50 - 56						22 23 - 31												32 - 35																							
III. IMPOUNDMENT DESCRIPTION (Continued)																																																																							
h. Average effluent for this impoundment (gallons per day and year of record).																								i. Average daily influent for all impoundments at this facility (gallons per day and year of record).												j. Average daily effluent removed from all impoundments and discharged to streams, lakes, etc. (gallons per day and year of record).																																			
GALS./DAY												YEAR OF RECORD												GALS./DAY												YEAR OF RECORD												GALS./DAY												YEAR OF RECORD											
36 - 44												45 - 48												49 - 57												58 - 61												62 - 70												71 - 74											
III. IMPOUNDMENT DESCRIPTION (Continued)																																																																							
k. TYPE OF BOTTOM LINER (Enter no. from the types listed into blocks 23 and 24.) IF CLAY LINER NO. 2,3 OR 4 IS SELECTED, GIVE THICKNESS IN INCHES (Enter in blocks 25 thru 27.)																								l. FOR AGRICULTURAL IMPOUNDMENT GIVE AVERAGE DAILY NUMBER (in blocks 40 thru 45) AND TYPE (in block 46) OF LIVESTOCK.																																															
01. None 02. Clay 03. Bentonite Modified 04. Chemically Modified Clay 05. Concrete 06. Asphalt 07. Metal 08. Polyethylene 09. Plasticized PVC 10. Butyl Rubber Sheeting 11. Hypalon Sheeting 12. Ethylene Propylene 13. Chlorinated Polyethylene 14. Other Membrane type (Specify in blks. 28 - 39.) 15. Other (Specify in blocks 28 thru 39.)																								1. Cattle 2. Hogs 3. Sheep 4. Poultry 5. Other																																															
3																																																																							
22 23 25 27 28 - 39																								40 - 45 46																																															
IV. GROUND-WATER MONITORING																								V. GROUND-WATER DEGRADATION																																															
a. Number of monitoring wells associated with this impoundment (if '0' enter and go to Question V.b.).												b. FREQUENCY OF GROUND-WATER QUALITY SAMPLING FROM MONITORING WELLS.												a. HAVE SIGNIFICANT CHANGES IN GROUND-WATER QUALITY BEEN OBSERVED IN ANALYSIS FROM MONITORING WELLS? (If 'yes', explain and describe below how the site was corrected.)												b. HAS THE GROUND-WATER QUALITY OF DRINKING WATER WELLS IN THE AREA BEEN ADVERSELY AFFECTED BY SEEPAGE FROM THIS IMPOUNDMENT? (If 'yes', explain below.)																																			
1. None 2. Daily 3. Weekly 4. Monthly 5. Quarterly 6. Semi-Annually 7. Yearly 8. Other (Specify in blocks 50 thru 61.)																								1. Yes 2. No 3. Unknown 4. Not Applicable												1. Yes 2. No 3. Unknown 4. Not Applicable (Can only be used when there are no wells within one mile of impoundment.)																																			
EXPLAIN:																								EXPLAIN:																																															
47 48												49 50 - 61												62												63																																			
VI. RATING OF THE GROUND-WATER CONTAMINATION POTENTIAL (See instruction manual EPA 570/9-78-003)																																																VII. WASTE IDENTIFICATION NO.																							
STEP 1				STEP 2				STEP 3				STEP 4				STEP 5				STEP 6				MISCELLANEOUS IDENTIFIERS				Enter the waste identification number for Part VI, Step 4.																																											
UNSAT. ZONE				CONFIDENCE				G.W. AVAIL.				CONFIDENCE				G.W. QUAL.				CONFIDENCE				WASTE				CONFIDENCE				G.W. CONTAM. POTENTIAL				HEALTH HAZARD				CONFIDENCE																															
4																																																																							
22 23 24				25				26 27				28				29				30				31				32				33 34				35 36				37				38 - 40				41 - 44																							

DATE PREPARED												U.S. ENVIRONMENTAL PROTECTION AGENCY SURFACE IMPOUNDMENT ASSESSMENT (SIA) LOCATION AND COUNT OF IMPOUNDMENTS SECTION I												SERIAL NUMBER												
MONTH		DAY		YEAR																																
75	76	77	78	79	80																															
FACILITY IDENTIFICATION												How many impoundments are located at this site?												STATE IDENTIFICATION NO. (Optional)												
STATE		CNTY./CITY		PLACE		CATEGORY		SIA SITE NUMBER				1						200																		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37
NPDES NUMBER												STANDARD INDUSTRIAL CLASSIFICATION (SIC Code)												SITE LOCATION												
												3555												DEGREES MINUTES SECONDS												
38												46												LATITUDE →												
																								LONGITUDE →												
																								0												
38												46												51 52 53 54 55 56												
																								57 58 59 60 61 62 63												
OWNER																																				
NAME OF OWNER																																				
2																																				
22																																				
OWNER'S MAILING ADDRESS (Street No. or P.O. Box)																																				
3																																				
22																																				
CITY OR TOWN																																				
STATE																																				
ZIP CODE																																				
4																																				
22																																				
OPERATOR																																				
NAME OF OPERATOR																																				
5																																				
22																																				
OPERATOR'S MAILING ADDRESS (Street No. or P.O. Box)																																				
6																																				
22																																				
CITY OR TOWN																																				
STATE																																				
ZIP CODE																																				
7																																				
22																																				

DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING  
DIVISION OF HAZARDOUS WASTE  
Central Regional Office  
FIELD INVESTIGATION FORM

Investigator(s) Stan Szyzanski MADO 46128559  
Date 1/8/81 Time \_\_\_\_\_ a.m.:  
Municipality Northbridge (Whitinsville) Worcester County  
Name of Facility ATF DAVIDSON Co. Inc Tel# 617-234-7451  
Address of Facility Main St.  
Individual Contacted: Joseph Rosol Title Plant Engineer  
Tel# 617-234-7451

NOTES RELATIVE TO CONDITIONS (Douglas Ave)

Area of Fly Ash impoundment, abandoned since 1950, is completely covered approximately 2 acres of shallow pond. Presently area is covered with vegetative growth. no leachate or runoff.

Area in vicinity of Whitin Casting Co., off Main St. - approximately 5 acre site had been part of the Mumford River, since 1890's has been filled with gravel, excavation fill, fly ash and ashes from coal boilers & power furnaces. - small impoundment still exists covered with frozen over at this time adjacent to Meadow Pond.

No water supplies nearby, water is furnished by surface reservoirs upstream of the site location

Samples Taken: Yes \_\_\_\_\_ No ☒

Date Delivered to L.E.S.: \_\_\_\_\_ Individual Receiving Samples \_\_\_\_\_



ATF-DAVIDSON COMPANY

MAIN STREET  
WHITINSVILLE, MASSACHUSETTS 01588  
(617) 234-7451 TELEX 928-429

JAN 16 1981  
C. M. A. P. C. D.

January 13, 1981

Mr. Glen Gilmore  
Commonwealth of Massachusetts  
Division of Hazardous Wastes  
License Division  
600 Washington St.  
Boston, MA 02111

Dear Mr. Gilmore:

On January 9, 1981, I met with Mr. Stanley Szczurko of the Hazardous Waste Division; and based on this meeting and information received from his telephone conversation with you, we are applying for a license to generate and store hazardous waste material on the site as proposed in attached layout.

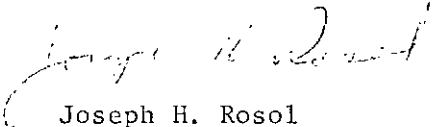
We do have our E.P.A. Identification Number (MAD046128559), and have applied for our permit. We have not held a Massachusetts license; we were not aware that it was necessary.

All hazardous waste material will be stored and accumulated for approximately 6 months, and when disposed of, will be handled to meet all necessary regulations and manifest system.

We will deeply appreciate further information on how we should proceed further in this matter.

Sincerely,

ATF-DAVIDSON COMPANY

  
Joseph H. Rosol  
Plant Engineer

JHR:lk

cc: Mr. E. Benoit (Chief Central Regional Office - Div.  
of Hazardous Waste - Worcester, MA)

ATF-DAVIDSON CO.

cc: Mr. R. C. Bryan  
Mr. E. Baillargeon  
Mr. D. Marques





ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY  
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• MAD046128559

INSTALLATION ADDRESS

ATF-DAVIDSON CO INC  
MAIN ST  
WHITINSVILLE

MA 01588

MAIN ST  
WHITINSVILLE

MA 01588



D. - FOR OFFICIAL USE ONLY											
1	2	3	4	5	6	7	8	9	10	11	12
W	M	A	D	O	4	6	1	2	8	5	5
1	2	3	4	5	6	7	8	9	10	11	12
1	2	3	4	5	6	7	8	9	10	11	12

# IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F001 23 - 26	2 F003 23 - 26	3 F005 23 - 26	4 F006 23 - 26	5 F007 23 - 26	6 F008 23 - 26
7 F009 23 - 26	8 F010 23 - 26	9 F011 23 - 26	10  23 - 26	11  23 - 26	12  23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13  23 - 26	14  23 - 26	15  23 - 26	16  23 - 26	17  23 - 26	18  23 - 26
19  23 - 26	20  23 - 26	21  23 - 26	22  23 - 26	23  23 - 26	24  23 - 26
25  23 - 26	26  23 - 26	27  23 - 26	28  23 - 26	29  23 - 26	30  23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31  23 - 26	32  23 - 26	33  23 - 26	34  23 - 26	35  23 - 26	36  23 - 26
37  23 - 26	38  23 - 26	39  23 - 26	40  23 - 26	41  23 - 26	42  23 - 26
43  23 - 26	44  23 - 26	45  23 - 26	46  23 - 26	47  23 - 26	48  23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.


49  23 - 26	50  23 - 26	51  23 - 26	52  23 - 26	53  23 - 26	54  23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE (D001)
 ☐ 2. CORROSIVE (D002)
 ☒ 3. REACTIVE (D003)
 ☒ 4. TOXIC (D004)

# X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE 	NAME & OFFICIAL TITLE (type or print) Ernest Baillargeon Manager of Manufacturing	DATE SIGNED 8/4/80
---	---	-----------------------

## ROUTING AND TRANSMITTAL SLIP

Date 10/28/83

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. Sandra Vasil		
2. Mary Anne Gavin		
3.		
4.		
5.		

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

## REMARKS

SUBJECT: IBM Typewriter Maintenance

Please check over the attached list and make any corrections, additions, deletions necessary for your Branch. I have to turn this in to Don Toohey ASAP. Thanks.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
Eileen Hahnen <i>Eileen</i>	Phone No.

5041-102

OPTIONAL FORM 41 (Rev. 7-76)  
Prescribed by GSA  
FPMR (41 CFR) 101-11.206

FORM 1 GENERAL		ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		EPA I.D. NUMBER F MAD 046 128 559	
I. EPA I.D. NUMBER		MAD046128559		24 1980	
III. FACILITY NAME		ATF-DAVIDSON COMPANY, INC.			
V. FACILITY MAILING ADDRESS		MAIN STREET			
VI. FACILITY LOCATION		WHITINSVILLE, MASS. 01588			

**GENERAL INSTRUCTIONS**

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

## II. POLLUTANT CHARACTERISTICS

**INSTRUCTIONS:** Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

## III. NAME OF FACILITY

1	SKIP	ATF-DAVIDSON COMPANY, INC.
---	------	----------------------------

## IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
2	ROSOL JOSEPH PLANT ENGINEER	617	234 7451

## V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		B. CITY OR TOWN		C. STATE	D. ZIP CODE
3	MAIN STREET	4	WHITINSVILLE	MA	01588

## VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN		D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
5	MAIN STREET	6	WORCESTER	WHITINSVILLE	MA	01588		

## VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
7	3	5	7	9	(specify)	7	(specify)
DUPLICATING MACHINES							
C. THIRD				D. FOURTH			
7	3	5	5	5	(specify)	7	(specify)
Printing Trades Machines and Equipment							

## VIII. OPERATOR INFORMATION

A. NAME												B. Is the name listed in Item VIII-A also the owner?		
8	ATF-DAVIDSON COMPANY, INC.												<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)												D. PHONE (area code & no.)			
F = FEDERAL				M = PUBLIC (other than federal or state)				P (specify)				A 617 234 7451			
S = STATE				O = OTHER (specify)											
P = PRIVATE															

E. STREET OR P.O. BOX											
MAIN STREET											

F. CITY OR TOWN												G. STATE		H. ZIP CODE		IX. INDIAN LAND	
B WHITINSVILLE												MA		0 15 88		Is the facility located on Indian lands?	
																<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

## X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)												D. PSD (Air Emissions from Proposed Sources)											
9 N M A 0 0 1 2 5 2												9 P N A											
B. UIC (Underground Injection of Fluids)												E. OTHER (specify)											
9 U N A												9 N A (specify)											
C. RCRA (Hazardous Wastes)												E. OTHER (specify)											
9 R N A												9 N A (specify)											

## XI. MAP


Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

## XII. NATURE OF BUSINESS (provide a brief description)

MANUFACTURE OF DUPLICATING AND OFFSET PRINTING PRESSES

## XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)		B. SIGNATURE		C. DATE SIGNED	
RICHARD C. BRYAN PRESIDENT				10/31/80	

## COMMENTS FOR OFFICIAL USE ONLY

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<b>FORM 3</b>	<b>EPA</b>	<b>HAZARDOUS WASTE PERMIT APPLICATION</b> Environmental Protection Agency Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	<b>EPA I.D. NUMBER</b> <div style="border: 1px solid black; padding: 2px;">         F M A D 0 4 6 1 2 8 5 5 9 1       </div>
---------------	------------	--	---

FOR OFFICIAL USE ONLY				COMMENTS
APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)			
<div style="border: 1px solid black; display: inline-block; width: 20px; height: 20px; text-align: center;">23</div>	<div style="border: 1px solid black; display: inline-block; width: 20px; height: 20px; text-align: center;">24</div>			

## II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

<b>A. FIRST APPLICATION</b> (place an "X" below and provide the appropriate date)		<input type="checkbox"/> <b>2. NEW FACILITY</b> (Complete item below.)
<input checked="" type="checkbox"/> <b>1. EXISTING FACILITY</b> (See instructions for definition of "existing" facility. Complete item below.)	FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN	
<div style="display: flex; justify-content: space-between;"> <div>           YR. MO. DAY  <div style="border: 1px solid black; padding: 2px;">8 7 1 1 2 1 4</div> </div> <div>           FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., &amp; day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)         </div> </div>	<div style="display: flex; justify-content: space-between;"> <div>           YR. MO. DAY  <div style="border: 1px solid black; padding: 2px;">73 74 75 76 77 78</div> </div> <div>           FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., &amp; day) OPERATION BEGAN OR IS EXPECTED TO BEGIN         </div> </div>	

<b>B. REVISED APPLICATION</b> (place an "X" below and complete Item I above)	
<input checked="" type="checkbox"/> <b>1. FACILITY HAS INTERIM STATUS</b>	<input type="checkbox"/> <b>2. FACILITY HAS A RCRA PERMIT</b>

## III. PROCESSES - CODES AND DESIGN CAPACITIES

**A. PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

**B. PROCESS DESIGN CAPACITY** - For each code entered in column A enter the capacity of the process.

- 1. AMOUNT** - Enter the amount.
- 2. UNIT OF MEASURE** - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<b>Storage:</b>			<b>Treatment:</b>		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
<b>Disposal:</b>					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

**EXAMPLE FOR COMPLETING ITEM III** (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

<div style="display: flex; justify-content: space-between;"> <div>           DUP  <div style="border: 1px solid black; padding: 2px;">             1 2 3 4 5 6 7 8 9 10 11 12 13 14 15           </div> </div> <div>           T/A C  <div style="border: 1px solid black; padding: 2px;">             1           </div> </div> </div>									
LINE NUMBER	A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY		
		1. AMOUNT (specify)				1. AMOUNT			
		2. UNIT OF MEASURE (enter code)				2. UNIT OF MEASURE (enter code)			
X-1	S 0 2	600	G	5					
X-2	T 0 3	20	E	6					
1	S 0 1	2200	G	7					
2	S 0 2	2000	G	8					
3	T 0 1	5000	U	9					
4				10					



III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES								
	1. PROCESS CODES (enter)						2. PROCESS DESCRIPTION (if a code is not entered in D(1))								
X-1	K	0	5	4	900	P	T	0	3	D	8	0			
X-2	D	0	0	2	400	P	T	0	3	D	8	0			
X-3	D	0	0	1	100	P	T	0	3	D	8	0			
X-4	D	0	0	2											included with above



IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL HAZARDOUS WASTE CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)															
S	F	M	A	D	0	4	6	1	2	8	5	5	9	T/A/C	6
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

## V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

## VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

## VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)										LONGITUDE (degrees, minutes, & seconds)									
4	2	0	6	3	8					7	1	4	0						
65	66	67	68	69	70	71				72	73	74	75	76	77	78	79		

## VIII. FACILITY OWNER


☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER										2. PHONE NO. (area code & no.)									
WHITE CONSOLIDATED INDUSTRIES, INC.										216-252-3700									
3. STREET OR P.O. BOX										4. CITY OR TOWN									
11770 BERE A ROAD										CLEVELAND									
5. ST.										6. ZIP CODE									
OH										44111									

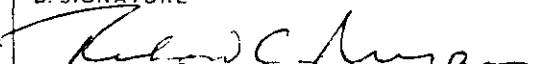
## IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
John B. Schulze		11/19/80

## X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
RICHARD C. BRYAN		10/31/80

EPA I.D. NUMBER (enter from page 1)												FOR OFFICIAL USE ONLY											
W M A D 04 6 1 2 8 5 5 9 1												W DUP 2 DUP											
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																							
EPA NO. 1-2	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEAS- URE (enter code)	D. PROCESSES																			
				1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))											
1	F 0 0 1	6000	P	S 0 1																			
2	F 0 0 3	3000	P	S 0 1																			
3	F 0 0 5	1200	P	S 0 1																			
4	F 0 0 6	2400	P	T 0 1 S 0 1																			
5	F 0 0 7	1000	P	T 0 1 S 0 1																			
6	F 0 0 8	1000	P	T 0 1 S 0 1																			
7	F 0 0 9	2000	P	T 0 1 S 0 1																			
8	F 0 1 0	200	P	S 0 1																			
9	F 0 1 1	4000	P	S 0 1																			
10	F 0 1 7	300	G	S 0 1																			
11																							
12																							
13																							
14																							
15																							
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19																							
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21																							
22																							
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24																							
25																							
26																							

3/2/79 two town wells on Whitins Pond have a combined yield of 2 MGD, the pond is used as an indirect surface water supply

QUESTIONNAIRE ON MASSACHUSETTS SURFACE IMPOUNDMENTS

## NOTES:

1. The form is designed to be easy to fill out. Most of the questions are multiple choice. We do not intend this to be a research project for you. We would prefer to receive partially completed forms rather than delay the mailing. Items 1-7 are most critical.
2. Even though an impoundment is now closed or is soon to be closed, it may still pose a very serious hazard. Please complete the form for closed sites as well as active ones.
3. This study must be completed by mid-spring time. We would appreciate it very much if you would mail back this form before MAR 2<sup>nd</sup> 1979, so that we can avoid spending the time and tax money required for follow-up phone calls.
4. The red file number on the upper right hand corner of this form corresponds to the red file number beside the site on the attached map. This is especially important if you have received a single map sheet containing several sites and several attached forms.
5. If you are not the person in your municipality to whom this questionnaire should have been directed, please pass it on to the appropriate person.

1. Who is completing this form? Name DELWYN K. BARNES Phone 617-234-7358  
Street 44 LAKE ST Town & State WHITINSVILLE, MA Zip 01588
2. Please examine the enclosed map: Who is the owner of the land on which this site occurs?  
Name ATF DAVIDSON CO. Street MAIN ST  
Town & State WHITINSVILLE, MA Zip 01588 Phone 617-234-7451
3. If other than above, who is the principal operator of the site?  
Name \_\_\_\_\_ Street \_\_\_\_\_  
Town & State \_\_\_\_\_ Zip \_\_\_\_\_ Phone \_\_\_\_\_
4. What kind of facility is this? (plastics, sewage treatment etc.) FLY ASH
5. Where does the water come from for your municipality? (check appropriate boxes)  
☐ Primarily individual wells or private withdrawal from surface water.  
☒ Public Wells (How many are operating at least part of the year? 151)  
☒ Public Reservoir (Name(s) (WHITINS ROAD) MEADOW POND, STOCK POND, CARPENTER RESERVOIR, RESERVOIRS Nos. 4, 5, & 6 (indirectly))  
☐ River (Name(s) \_\_\_\_\_)  
☐ Our water is purchased out of town. (Where \_\_\_\_\_)
6. About how many houses are connected to public water? 2,500 ±
7. Now, please look at the accompanying map. If any of your sources of public water fall on the map, please do the following:
  - A. If public supply wells are located within the area of the map, place a cross (+) at each, and put a (W) beside the cross. Also (if you can provide the information without holding up the mailing of this form) write the rated capacity of the well in gallons per day (GPD) beside each cross. It is important to plot these crosses precisely.
  - B. If lakes or reservoirs are used for public water, place an (S) (for surface water) on the water body. If the pumping station appears on the map, place a (P) at its site.
  - C. If rivers are used for public water, place an (R) on the river. If it is also on the map, place a (P) at the pumping station.

(Over please)

8. Soil conditions near the impoundments: If you can answer these questions without holding up the mailing of this questionnaire we would like to have an idea of the soil conditions near the impoundments. Are any of the following true?

- ☐ The impoundment is an old gravel pit.
- ☐ There are a number of nearby gravel pits.
- ☒ The vicinity is mostly ledge, marl or clay.
- ☐ The bottom of the impoundment has been sealed with ☐ Plastic Film ☐ Clay  
☐ Some other treatment (name if known \_\_\_\_\_).

If, for any reason, you have further knowledge of the soil conditions, please write us a note in the Any More Comments? section at the end.

9. What sort of waste is entering the impoundment?

- ☒ Sewage or sewage sludge
- ☐ Plastics industry solvents
- ☒ Tannery solutions
- ☐ Pickling baths
- ☐ Fire protection pond
- ☐ Your photo interpreter was drunk, it's only a natural pond in an old gravel pit
- ☐ Other (type if possible FLY ASH)
- ☐ Petroleum Waste
- ☐ Dry cleaning wastes
- ☒ Metal plating baths
- ☐ Unadulterated cooling water
- ☐ Not Known

10. Has your community had environmental problems with this impoundment? ☐ Yes ☒ No  
If Yes, please make any comments below which you feel might be pertinent to our study.

11. Do you know if any of the following are true?

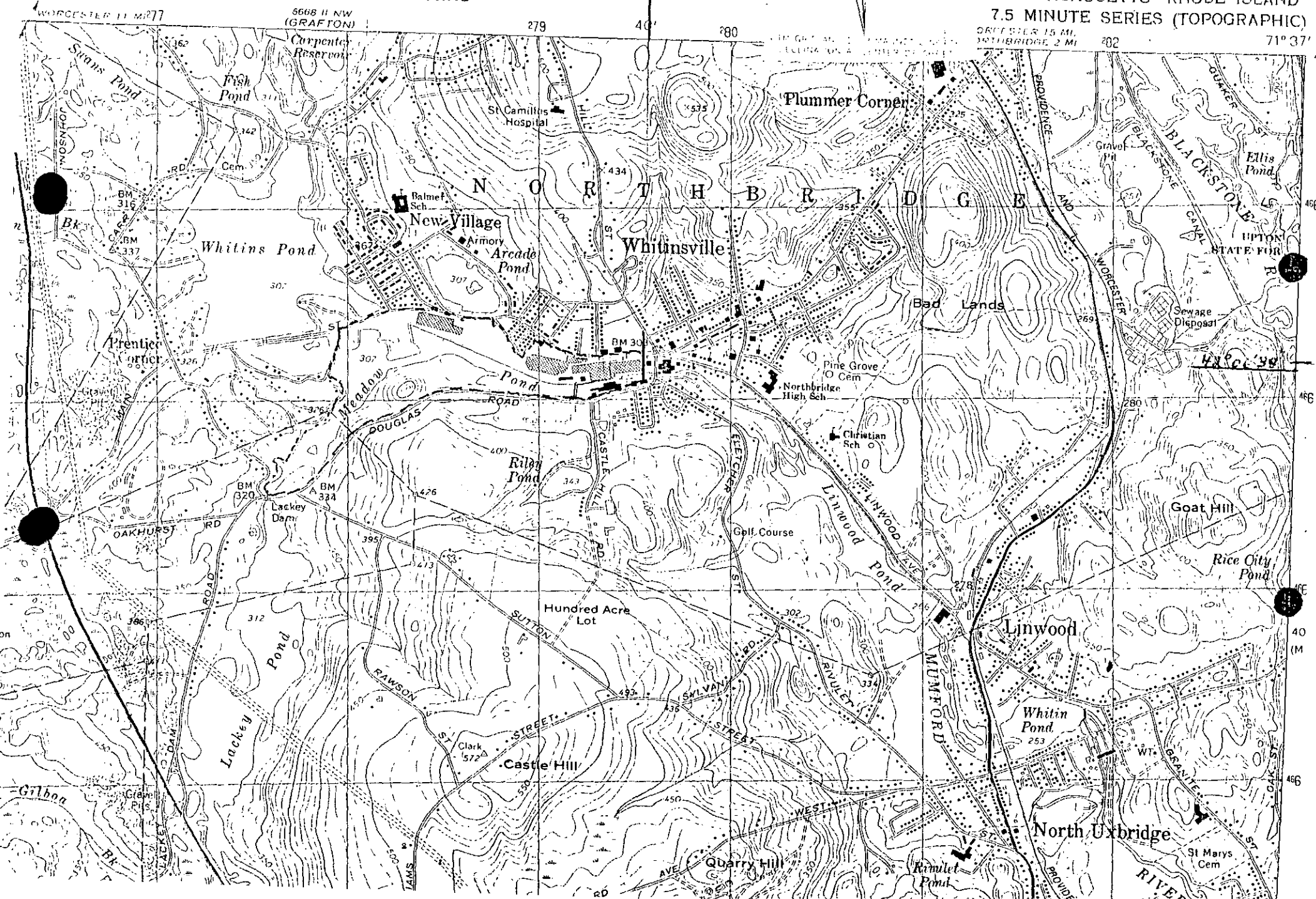
- ☒ The site is being or has been abandoned as an impoundment
- ☐ There are monitoring wells present at the site
- ☐ There are interceptor wells or other means currently being employed at the site to inhibit migration of contaminants from the site into the groundwater.

12. Any More Comments?

*Has been abandoned for many years.*

71° 40' 00"

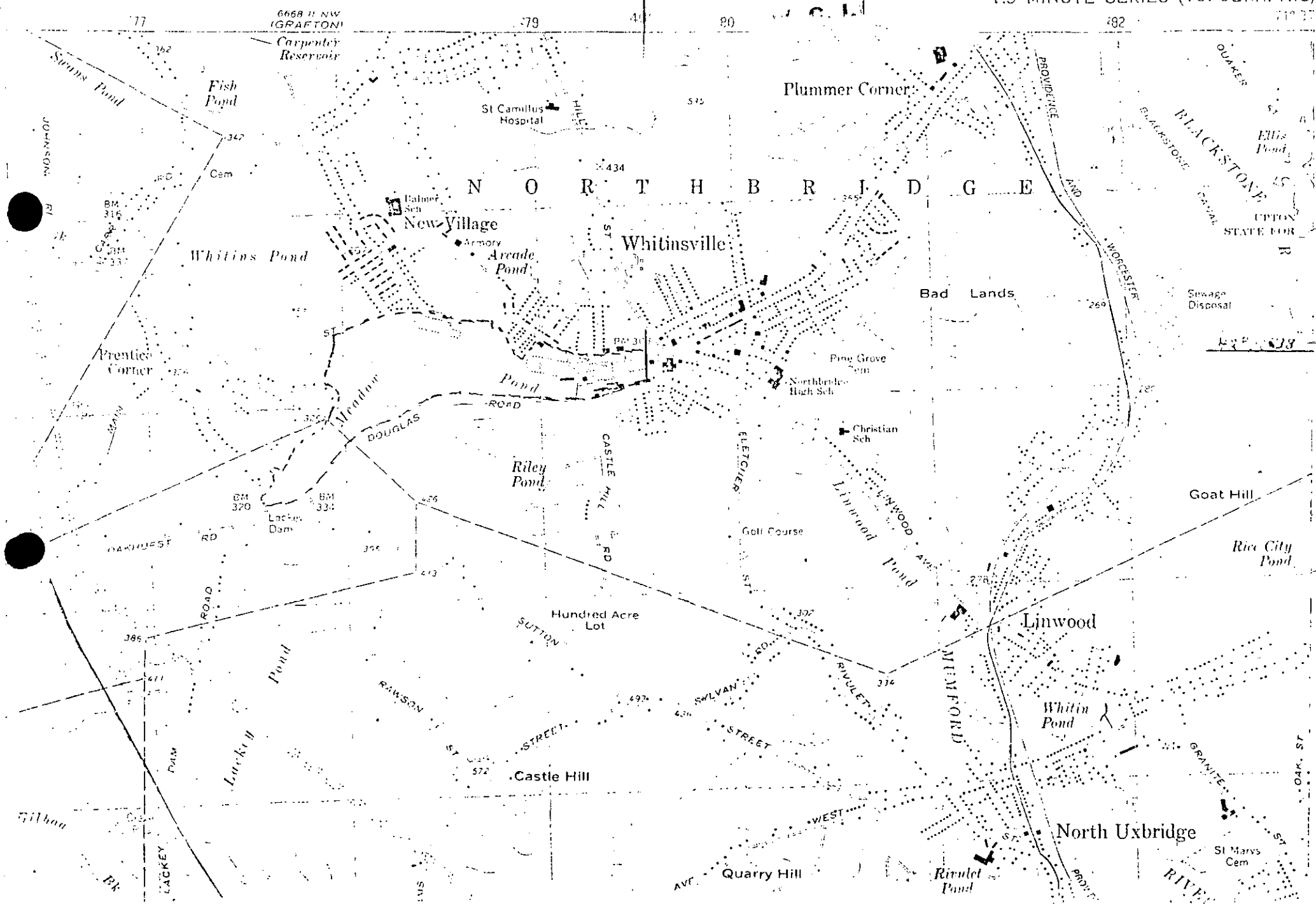
1.135	1.98
258 miles	327 miles



COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC WORKS

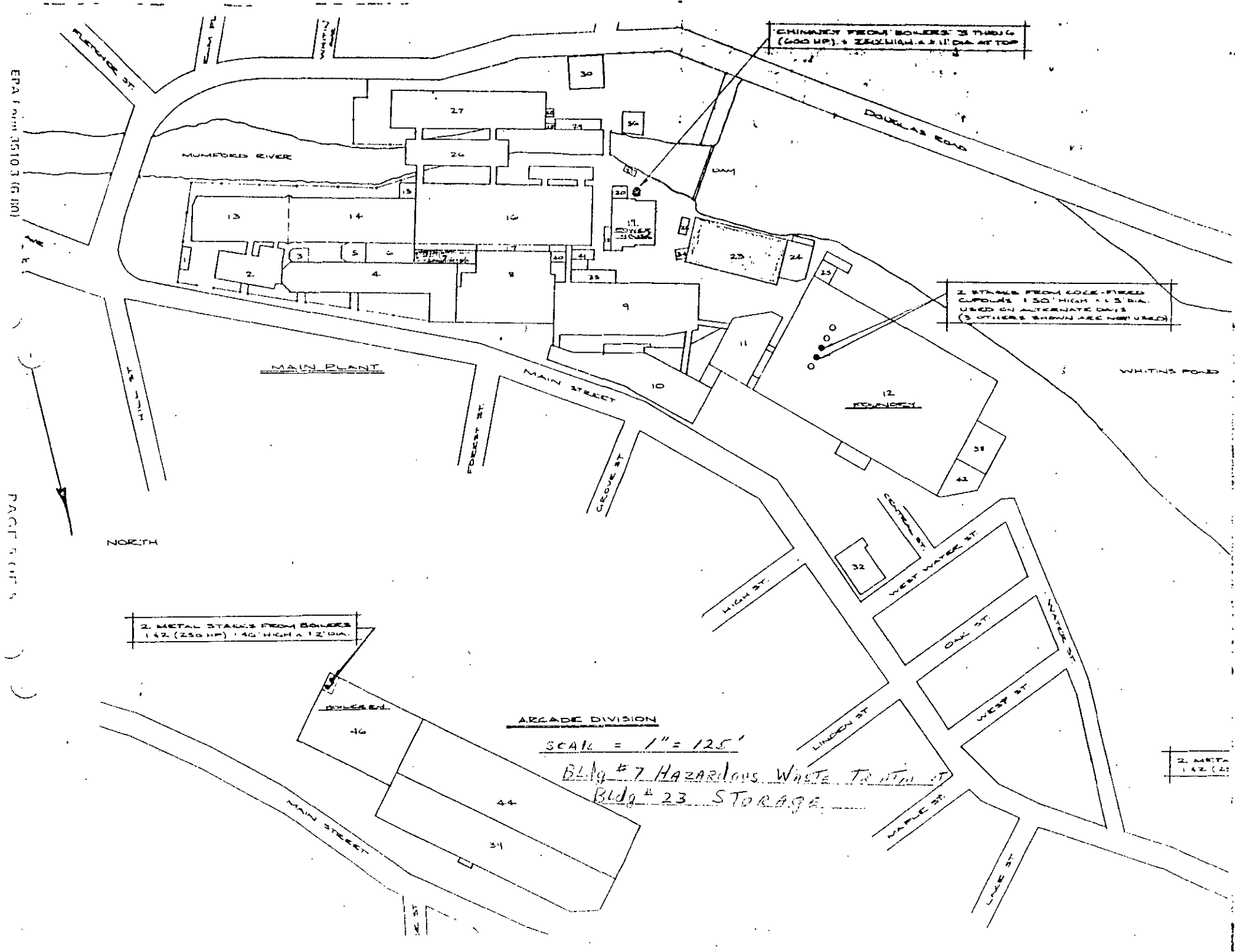
71° 40' 00"  
RECEIVED  
SEP 24 1980

UXBRIDGE QUADRANGLE  
MASSACHUSETTS-RHODE ISLAND  
7.5 MINUTE SERIES (TOPOGRAPHIC)



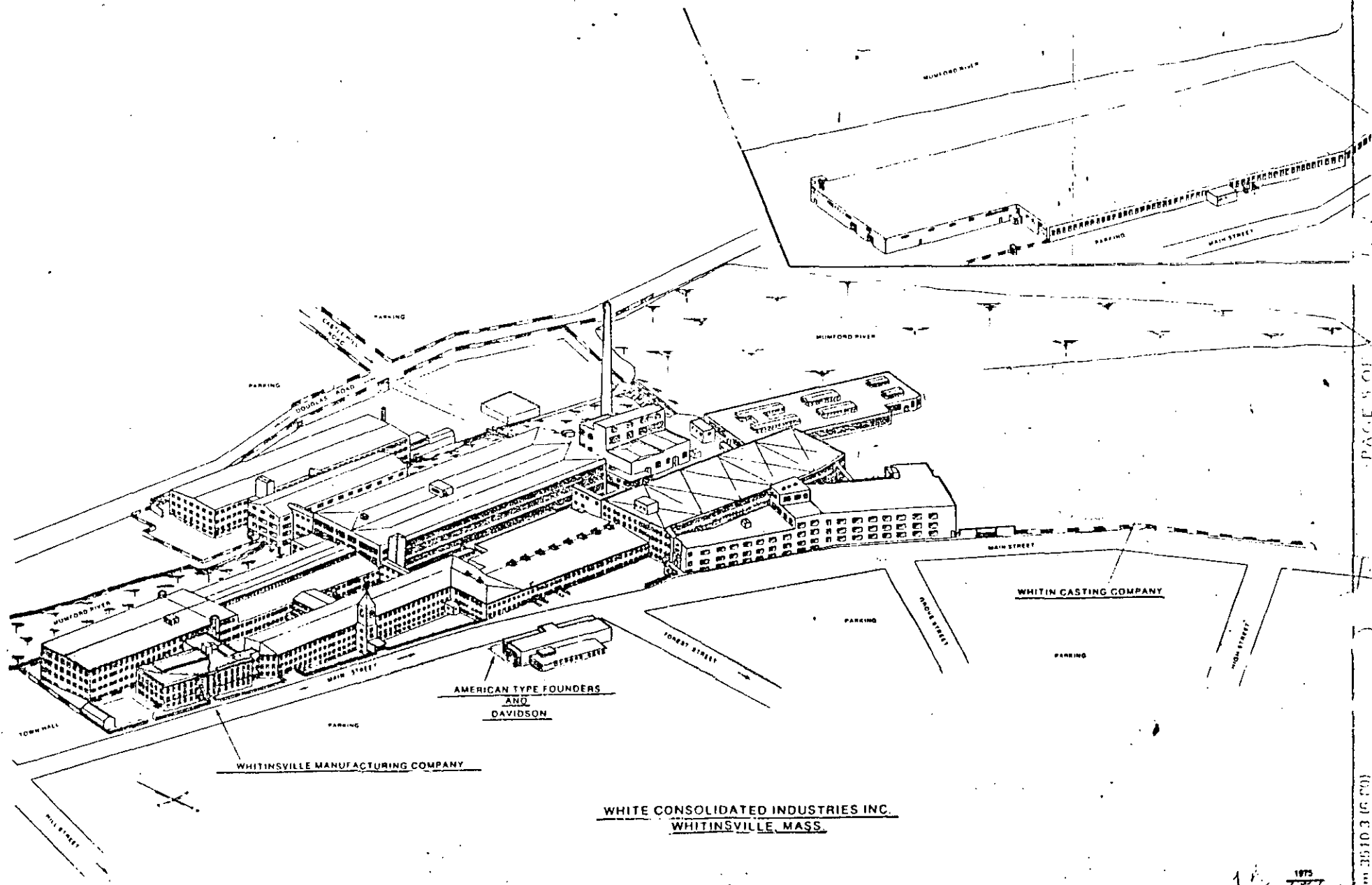
EPA Form 3510-3 (6/80)

PAGE 5 (of 5)



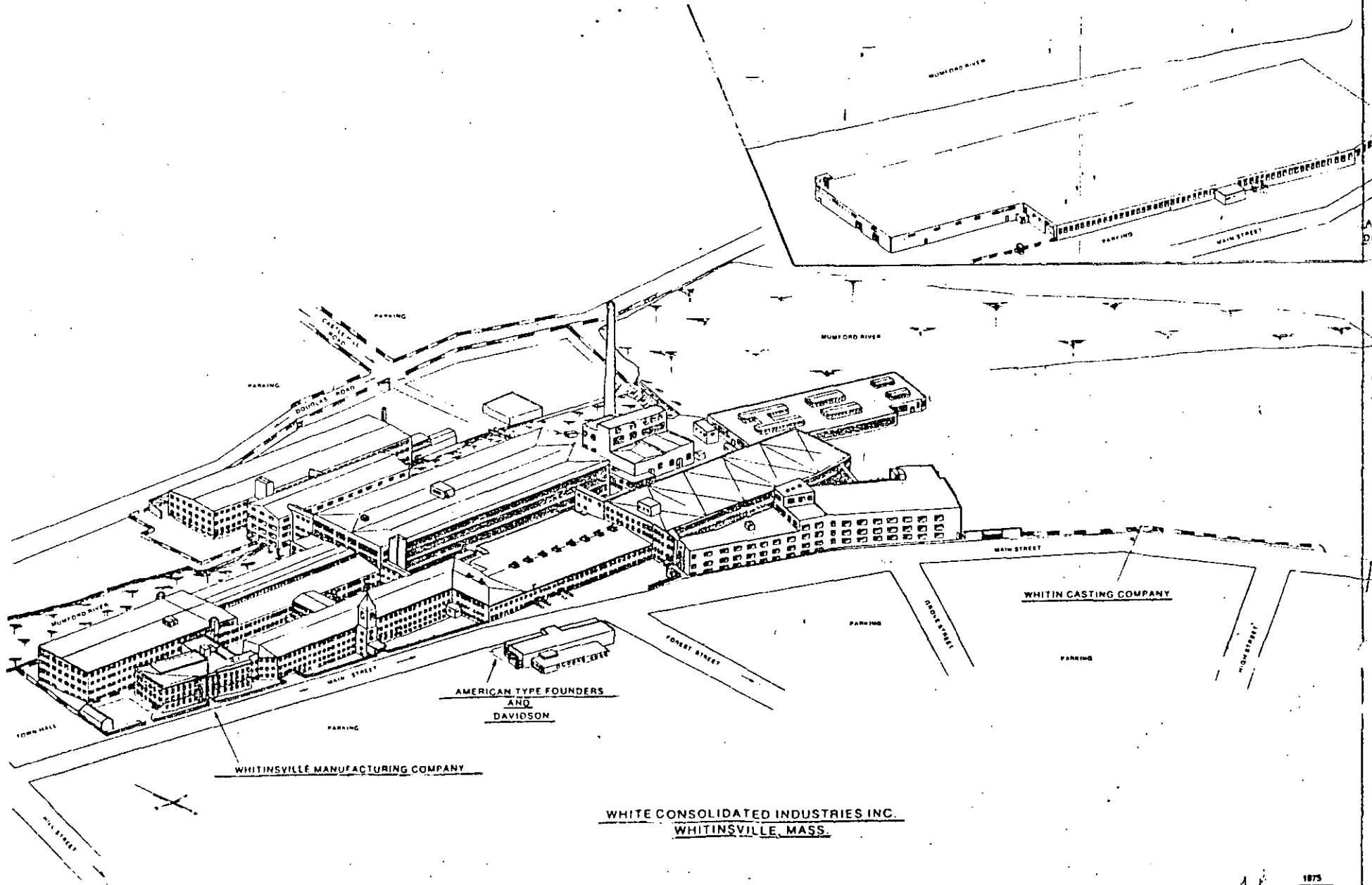
1. 1/2" = 125'





WHITE CONSOLIDATED INDUSTRIES INC.  
WHITINSVILLE, MASS.

1 1975

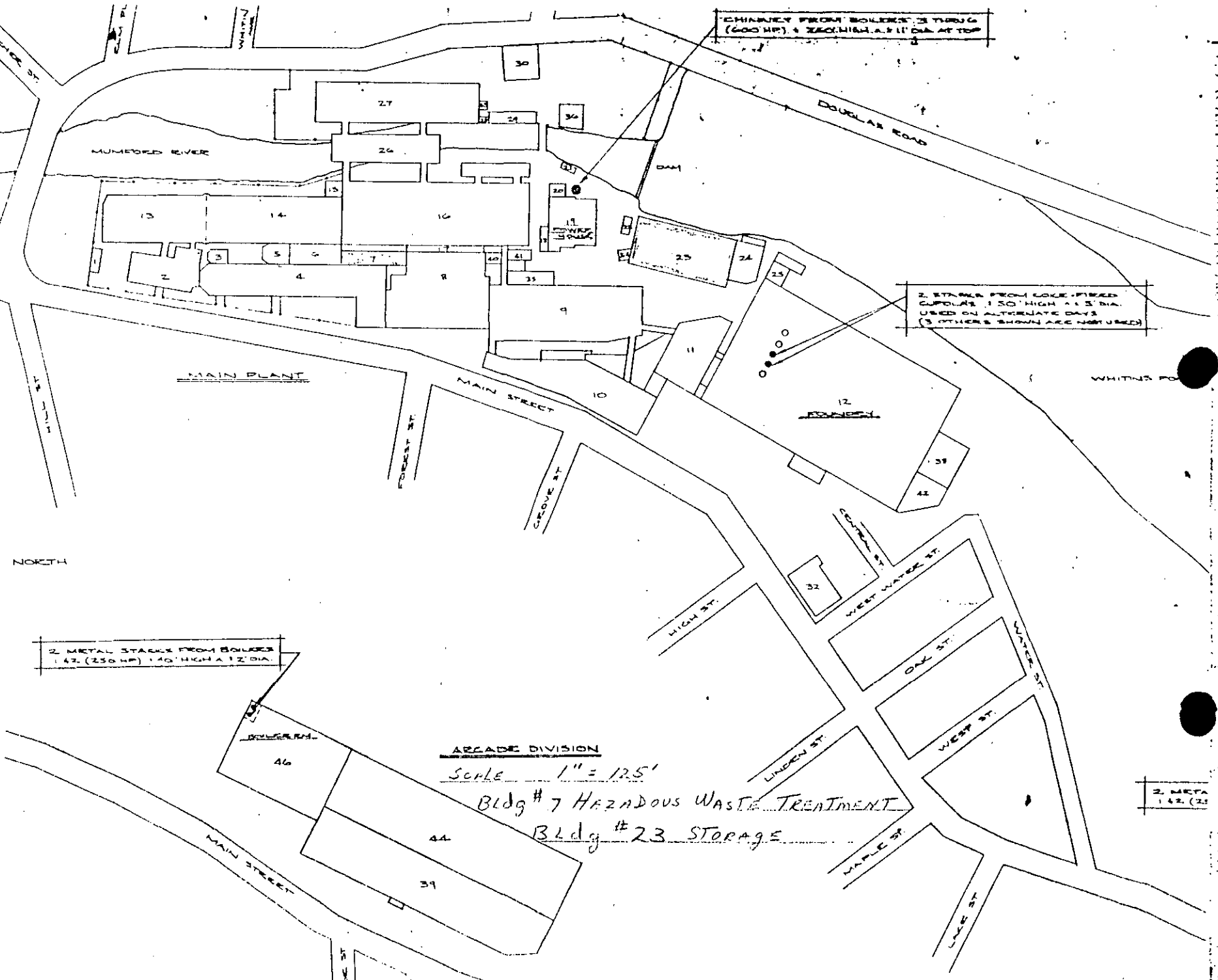


WHITE CONSOLIDATED INDUSTRIES INC.  
WHITINSVILLE, MASS.

1875

EPA Form 3010-3 (6/80)

PAGE 1 OF 5



2 METAL STACKS FROM BOILERS  
1 42 (250 HP) 1 40' HIGH 1 2' DIA

CHIMNEY FROM BOILER 3 THROUGH  
(600 HP) 4 220' HIGH 2 11' DIA AT TOP

2 STAKES FROM COKE-FIRED  
CUPOLAR 1 50' HIGH 1 1 3' DIA.  
USED ON ALTERNATE DAYS  
(3 OTHERS SHOWN ARE NOT USED)

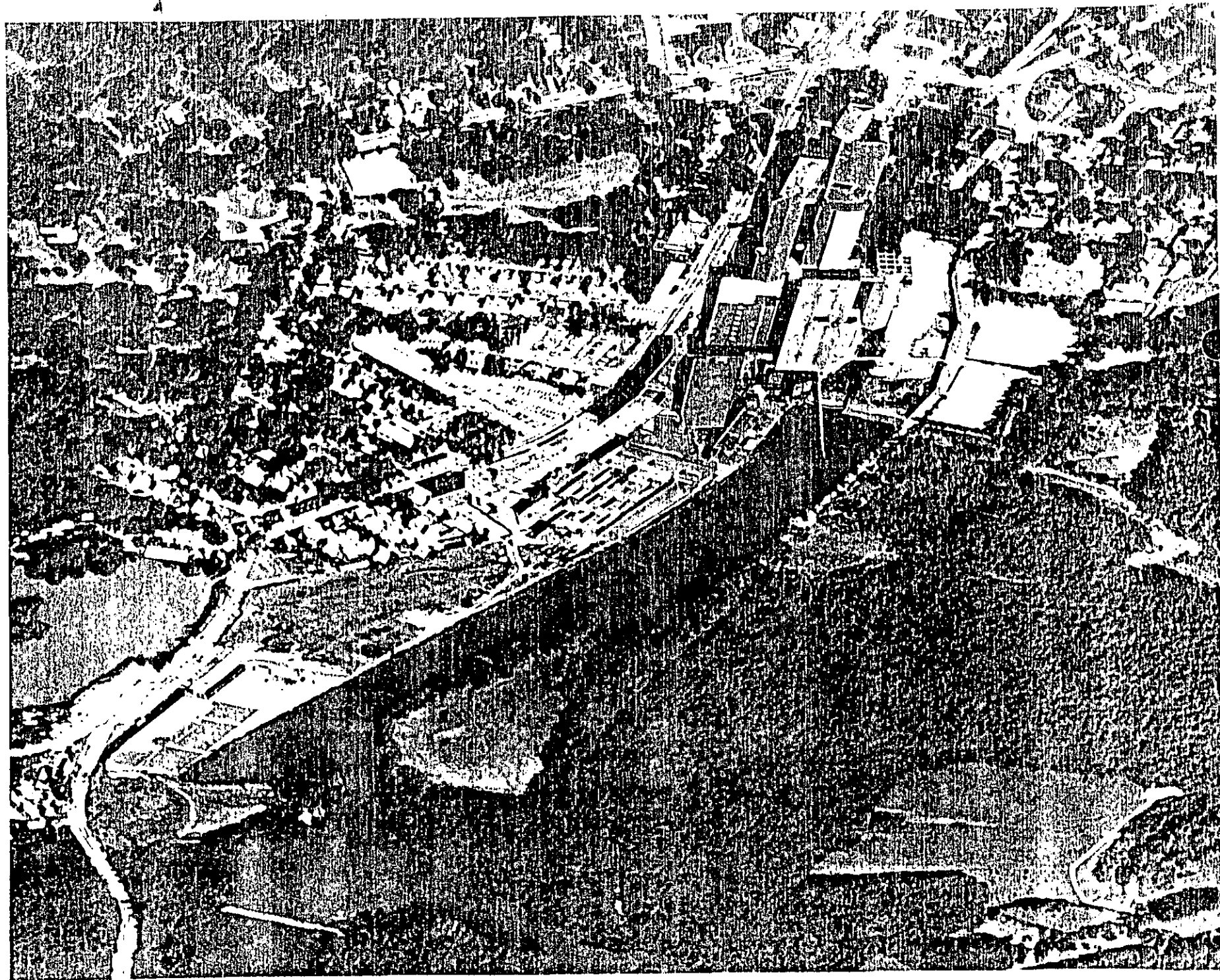
ARCANE DIVISION

SCALE 1" = 125'

Bldg #7 HAZARDOUS WASTE TREATMENT

Bldg #23 STORAGE

2 METAL  
1 42 (21'



## GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

WED

F M A D 0 4 6 1 2 8 5 5 9

V A C  
3 D

FORM

1



GENERAL

## LABEL ITEMS

I. EPA I.D. NUMBER

MAD046128559

III. FACILITY NAME

ATF-DAVIDSON COMPANY, INC.

V. FACILITY MAILING ADDRESS

MAIN STREET

PLEASE PLACE LABEL IN THIS SPACE

VI. FACILITY LOCATION

WHITINSVILLE, MASS. 01588

## GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (this area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

## II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

## SPECIFIC QUESTIONS

## MARK 'X'

YES NO FORM ATTACHED

A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)

X

B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)

X

C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)

X

D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)

X

E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)

X

X

F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)

X

G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)

X

H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)

X

I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)

X

J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)

X

## III. NAME OF FACILITY

1 SKIP ATF-DAVIDSON COMPANY, INC.

## IV. FACILITY CONTACT

## A. NAME &amp; TITLE (last, first, &amp; title)

## B. PHONE (area code &amp; no.)

2 ROSOL JOSEPH PLANT ENGINEER

6 1 7 2 3 4 7 4 5 1

## V. FACILITY MAILING ADDRESS

## A. STREET OR P.O. BOX

3 MAIN STREET

## B. CITY OR TOWN

## C. STATE

## D. ZIP CODE

4 WHITINSVILLE

MA

0 1 5 8 8

## VI. FACILITY LOCATION

## A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 MAIN STREET

## B. COUNTY NAME

WORCESTER

## C. CITY OR TOWN

## D. STATE

## E. ZIP CODE

## F. COUNTY CODE (if known)

6 WHITINSVILLE

MA

0 1 5 8 8

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
7	3	5	7	9	(specify) Duplicating Machines	7				(specify)									
C. THIRD										D. FOURTH									
7	3	5	5	5	(specify) Printing Trades Machines and Equipment	7				(specify)									

VIII. OPERATOR INFORMATION

A. NAME										B. Is the name listed Item VIII-A also the owner?									
8	ATF-DAVIDSON COMPANY, INC.																		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)										D. PHONE (area code & no.)										
F = FEDERAL	M = PUBLIC (other than federal or state)	P	(specify)							A	6	1	7	2	3	4	7	4	5	1
S = STATE	O = OTHER (specify)																			
P = PRIVATE																				

E. STREET OR P.O. BOX									
MAIN STREET									

F. CITY OR TOWN										G. STATE		H. ZIP CODE		IX. INDIAN LAND	
WHITINSVILLE										MA		0 15 88		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

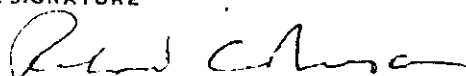
X. EXISTING ENVIRONMENTAL PERMITS									
A. NPDES (Discharges to Surface Water)					D. PSD (Air Emissions from Proposed Sources)				
9	N	M	A	001252	9	P			
B. UIC (Underground Injection of Fluids)					E. OTHER (specify)				
9	U				9				
C. RCRA (Hazardous Wastes)					E. OTHER (specify)				
9	R				9				

XI. MAP									
<p>Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.</p>									

XII. NATURE OF BUSINESS (provide a brief description)									
MANUFACTURE OF DUPLICATING AND OFFSET PRINTING PRESSES									

F9:A/50

F9:A/51

XIII. CERTIFICATION (see instructions)									
<p>I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.</p>									
A. NAME & OFFICIAL TITLE (type or print)					B. SIGNATURE			C. DATE SIGNED	
RICHARD C. BRYAN PRESIDENT								10/31/80	

COMMENTS FOR OFFICIAL USE ONLY									

FORM <b>3</b> RCRA		HAZARDOUS WASTE PERMIT APPLICATION <i>Consolidated Permits Program</i> <small>(This information is required under Section 3005 of RCRA.)</small>	I. EPA I.D. NUMBER											
			F	M	A	D	0	4	6	1	2	8	5	5

FOR OFFICIAL USE ONLY

[illegible]

## II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (*mark one box only*) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

- A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.) ☐ 2. NEW FACILITY (Complete item below.)

C	YR.	MO.	DAY	FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)	YR.	MO.	DAY	PROVIDE THE DATE (yr., mo., & day) OPER- TION BEGAN OR IS EXPECTED TO BEGIN
8	71	12	14					
15	73 74	75 76	77 78		73 74	75 76	77 78	

- B. REVISED APPLICATION** (place an "X" below and complete Item I above)

- ☒ 1. FACILITY HAS INTERIM STATUS ☐ 2. FACILITY HAS A RCRA PERMIT

### III. PROCESSES – CODES AND DESIGN CAPACITIES

- A. **PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (*including its design capacity*) in the space provided on the form (*Item III-C*).

- B. PROCESS DESIGN CAPACITY** — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<b>Storage:</b>			<b>Treatment:</b>		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS		T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	INCINERATOR		
<b>Disposal:</b>			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)		
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY		T04	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS . . . . .	G	LITERS PER DAY . . . . .	V	ACRE-FEET . . . . .	A
LITERS . . . . .	L	TONS PER HOUR . . . . .	D	HECTARE-METER . . . . .	F
CUBIC YARDS . . . . .	Y	METRIC TONS PER HOUR . . . . .	W	ACRES . . . . .	B
CUBIC METERS . . . . .	C	GALLONS PER HOUR . . . . .	E	HECTARES . . . . .	Q
GALLONS PER DAY . . . . .	U	LITERS PER HOUR . . . . .	H		

**EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below):** A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP										1	
LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY			FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY			FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)					1. AMOUNT	2. UNIT OF MEASURE (enter code)		
1	S 0 1	2200	000	G		7					
2	S 0 2	2000	000	G		8					
3	T 0 1	5000	000	U		9					
4						10					



EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE												
WMAD04612855931													W DUP 2 DUP												
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																									
LINE NO.	A. EPA HAZARD WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																		
							1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))										
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26
1	F	0	0	1	6000	000	P	S	0	1															
2	F	0	0	3	3000	000	P	S	0	1															
3	F	0	0	5	1200	000	P	S	0	1															
4	F	0	0	6	2400	000	P	T	0	1	S	0	1												
5	F	0	0	7	1000	000	P	T	0	1	S	0	1												
6	F	0	0	8	1000	000	P	T	0	1	S	0	1												
7	F	0	0	9	2000	000	P	T	0	1	S	0	1												
8	F	0	1	0	200	000	P	S	0	1															
9	F	0	1	1	4000	000	P	S	0	1															
10	F	0	1	7	2508000		P	S	0	1															
11																									
12																									
13																									
14																									
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21																									
22																									
23																									
24																									
25																									
26																									



## IV. DESCRIPTION OF HAZARDOUS WASTE

(continued)

E. USE THIS SPACE TO LIST ADDITIONAL ACCESS CODES FROM ITEM D(1) ON

EPA I.D. NO. (enter from page 1)

FMAD046128559316

## V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail). F6: A/55

## VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail). F6: A/56

## VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, &amp; seconds)

42 06 38

LONGITUDE (degrees, minutes, &amp; seconds)

72 40

## VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code &amp; no.)

WHITE CONSOLIDATED INDUSTRIES, INC.

216-252-370

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

11770 BEREA ROAD

CLEVELAND

OH

44111

## IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

John B. Schulze

John B. Schulze

11/19/80

## X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

Richard C. Bryan

Richard C. Bryan

10/31/80

DATE PREPARED					U.S. ENVIRONMENTAL PROTECTION AGENCY										
					SURFACE IMPOUNDMENT ASSESSMENT (S)										
					OPERATIONAL FEATURES OF THE IMPOUNDMENT AND GROUND-WATER										
					SECTION II										
MONTH DAY YEAR					INSTRUCTIONS: This form is to be completed for one impoundment per site (facility) identified in Section I.										
3 2 7 7 9					impoundment per site selected via random sampling procedures. Complete multiple choice questions by entering										
75	76	77	78	79	80										

I. FACILITY IDENTIFICATION														
STATE		CNTY./CITY		PLACE		CATEGORY		SIA SITE NUMBER		IMPOUNDMENT NO.				
25		027		79495		HIV		08001				1		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

III. IMPOUNDMENT DESCRIPTION														
Age of impoundment in years.		b. IS IMPOUNDMENT PRESENTLY USED?		c. If answer to III.b is 'yes', give no. of years in operation.		d. If answer to III.b is 'no', give last year of operation.		e. Surface area of impoundment. (in acres)		f. Surface area of all impoundments at this site (in acres).				
2		1. Yes 2. NO		1950										
35	36	37	38	39	40	41	42	43	44	45	46	47	48	49

POND HAS BEEN FILLED AND IS NOW A PAVING LOT														
Average effluent for this impoundment (gallons per day and year of record).														
ALS./DAY		YEAR OF RECORD		GALS./DAY		YEAR OF RECORD								
36		44		45		48		57						

III. IMPOUNDMENT DESCRIPTION (Continued)															
TYPE OF BOTTOM LINER (Enter no. from the types listed into blocks 23 and 24.)															
IF CLAY LINER NO. 2,3 OR 4 IS SELECTED, GIVE THICKNESS IN INCHES (Enter in blocks 25 thru 27.)															
1. None      04. Chemically Modified Clay      07. Metal      10. Butyl Rubber Sheeting      13. Chlorinated Polyethylene 2. Clay      05. Concrete      08. Polyethylene      11. Hypalon Sheeting      14. Other Membrane type (Specify in blocks 28 thru 39.) 3. Bentonite Modified      06. Asphalt      09. Plasticized PVC      12. Ethylene Propylene      15. Other (Specify in blocks 28 thru 39.)															
3		22		23		24		25		26		27		28	

IV. GROUND-WATER MONITORING															
a. Number of monitoring wells associated with this impoundment (if '0' enter and go to Section V.b.).		b. FREQUENCY OF GROUND-WATER QUALITY SAMPLING FROM MONITORING WELLS.													
		1. None      4. Monthly      7. Yearly 2. Daily      5. Quarterly      8. Other (Specify in blocks 50 thru 61.) 3. Weekly      6. Semi-Annually													
		c. HAVE SIGNIFICANT CHANGES IN GROUND-WATER QUALITY OBSERVED IN ANALYSIS FROM MONITORING WELLS? (If yes, describe below how the site was corrected.)													
		1. Yes      2. No      3. Unknown      4. Not Applicable													
		EXPLAIN:													
47		48		49		50		51		52		53		54	

VI. RATING OF THE GROUND-WATER CONTAMINATION POTENTIAL (See instruction manual)																								
STEP 1					STEP 2					STEP 3					STEP 4					STEP 5				
UNSAT. ZONE		CONFIDENCE		G.W. AVAIL.		CONFIDENCE		G.W. QUAL.		CONFIDENCE		WASTE		CONFIDENCE		G.W. CONTAM. POTENTIAL		H						
2E		B		1E		C		5		C		5		C		20								
22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41					

Whitinsville (Northbridge)

1030

FORM APPROVED  
OMB NO. 156-578004

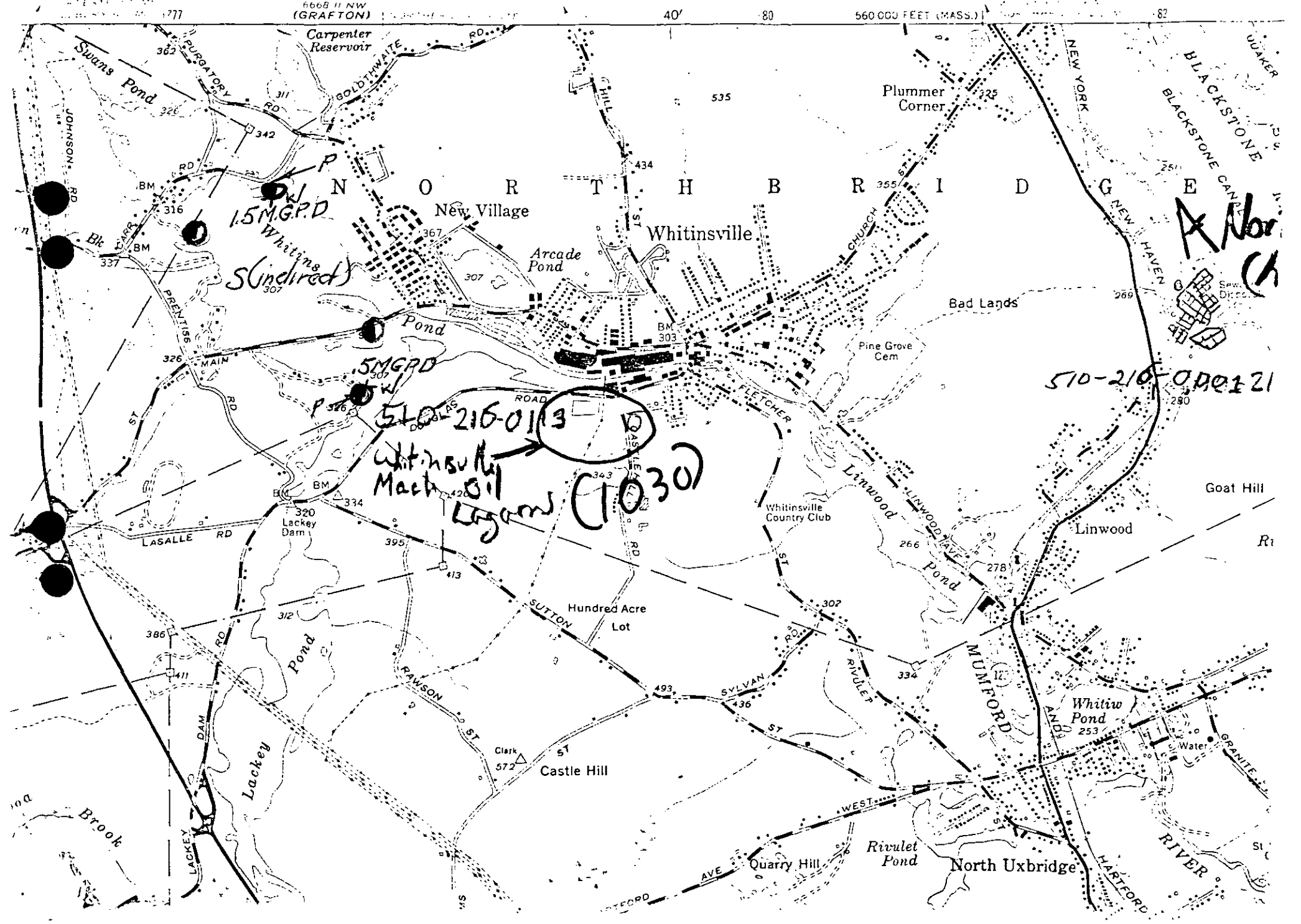
DATE PREPARED										U.S. ENVIRONMENTAL PROTECTION AGENCY SURFACE IMPOUNDMENT ASSESSMENT (SIA) LOCATION AND COUNT OF IMPOUNDMENTS SECTION I										SERIAL NUMBER																			
MONTH		DAY		YEAR												SIA OFFICE ONLY																							
75		76		77		78		79		80																													
3 2 7 7										AIN										① Imp. Now Parking lot formerly by Ash Pond ② Imp. National Pond. 9 western SIC																			
FACILITY IDENTIFICATION										How many impoundments are located at this site?										STATE IDENTIFICATION NO. (Optional)																			
STATE		CNTY.		CITY		PLACE		CATEGORY		SIA SITE NUMBER				1		①		②		③		④		⑤		⑥		⑦		⑧		⑨		⑩					
25		02		77		94		95		IND				1		①		②		③		④		⑤		⑥		⑦		⑧		⑨		⑩					
1		2		3		4		5		6		7		8		9		10		11		12		13		14		15		16		17		18					
NPDES NUMBER										STANDARD INDUSTRIAL CLASSIFICATION (SIC Code)										SITE LOCATION																			
										34										LATITUDE										LONGITUDE									
																				42 07 00										71 40 39									
OWNER										NAME OF OWNER																													
2										ATF DAVIDSON CO																													
OWNER'S MAILING ADDRESS (Street No. or P.O. Box)																																							
3										MAIN ST.																													
CITY OR TOWN										STATE										ZIP CODE																			
4										WHITINSVILLE										MA 01588																			
OPERATOR										NAME OF OPERATOR																													
5										SAME																													
OPERATOR'S MAILING ADDRESS (Street No. or P.O. Box)																																							
6										SAME																													
CITY OR TOWN										STATE										ZIP CODE																			
7										SAME																													

STATE OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC WORKS

6668 11 NW  
(GRAFTON)

Area I Uxbridge

UXBRIDGE QUADRANGLE  
MASSACHUSETTS—RHODE ISLAND  
7.5 MINUTE SERIES (TOPOGRAPHIC)



## DISCHARGE MONITORING REPORT (DMR)

F - FINAL LIMITS

OMB No. 2000-0015

TREATMENT PLANT EFFLUENT

NAME / ADDRESS (include  
(Location, if different)  
KATIE DAVIDSON COMPANY  
MAIN STREET  
ADDRESS PITTSVILLE MA 01588

MA0001252

001 A

**PERMIT NUMBER**

DISCHARGE NUMBER

**MONITORING PERIOD**

**FROM**

TO

470-31

622-234

124-29

1

4.27)

28-29

**NOTE: Read instructions before completing this form.**

PARAMETER (32-37)		QUANTITY OR LOADING (46-53)			QUALITY OR CONCENTRATION (54-61)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
1.0	SAMPLE MEASUREMENT	4753	9525							
1.0	PERMIT REQUIREMENT	300A AVG	DAILY MX							
1.0	SAMPLE MEASUREMENT				1.0		7.5			
1.0	PERMIT REQUIREMENT				MINIMUM		MAXIMUM			
1.0	SAMPLE MEASUREMENT						0.01			
1.0	PERMIT REQUIREMENT					DAILY AV	DAILY MX			
1.0	SAMPLE MEASUREMENT						0.01			
1.0	PERMIT REQUIREMENT					DAILY AV	DAILY MX			
1.0	SAMPLE MEASUREMENT						0.005			
1.0	PERMIT REQUIREMENT					DAILY AV	DAILY MX			
1.0	SAMPLE MEASUREMENT						0.005			
1.0	PERMIT REQUIREMENT					DAILY AV	DAILY MX			
1.0	SAMPLE MEASUREMENT						0.05			
1.0	PERMIT REQUIREMENT					DAILY AV	DAILY MX			

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT, SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE

AREA CODE

NUMBER

DATE

YEAR

MO

DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here).

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)

NAME **ATF-DAVIDSON COMPANY**

ADDRESS **MAIN STREET**

**WHITINSVILLE**

**MA 01586**

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

(2-16)

(17-19)

**MA0001252**

**001 A**

PERMIT NUMBER

DISCHARGE NUMBER

**F - FINAL LIMITS**

**TREATMENT PLANT EFFLUENT**

Form Approved

OMB No. 2000-0015

FACILITY

LOCATION

**ATF & D. ARKINS, PLANT #1, MAINTENANCE**

MONITORING PERIOD

FROM	YEAR	MO	DAY	TO	YEAR	MO	DAY
	52	09	01		82	09	30
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (54-61)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
COPPER, TOTAL (AS CU)	SAMPLE MEASUREMENT	*****	*****	*****	*****	---	0.30			
	PERMIT REQUIREMENT	*****	*****	*****	*****	DAILY AV	DAILY MX		ONCE / MONTH	COMPO
LEAD, TOTAL (AS LE)	SAMPLE MEASUREMENT	*****	*****	*****	*****	---	1.18			
	PERMIT REQUIREMENT	*****	*****	*****	*****	DAILY AV	DAILY MX		ONCE / MONTH	COMPO
ZINC, TOTAL (AS ZN)	SAMPLE MEASUREMENT	*****	*****	*****	*****		0.050			
	PERMIT REQUIREMENT	*****	*****	*****	*****	DAILY AV	DAILY MX		ONCE / MONTH	COMPO
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

**Ernest Baillargeon**

**Vice-President**

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)

**Daniel Marques**

**Facilities & Energy Mgr.**

SIGNATURE OF PRINCIPAL EXECUTIVE

OFFICER OR AUTHORIZED AGENT

TELEPHONE

**617 234-7451**

AREA CODE

NUMBER

DATE

**82 10 19**

YEAR

MO

DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS: (Reference all attachments here)

REPORT DAILY RANGE & MEAN FOR PH.

## DISCHARGE MONITORING REPORT (DMR)

(2-16)

(17-19)

TREATMENT PLANT EFFLUENT

file copy

COMPANY

WILMINGTON

MA 01588

MA0001257

PERMIT NUMBER

001 A

DISCHARGE NUMBER

## MONITORING PERIOD

FROM	YEAR	MO	DAY	TO	YEAR	MO	DAY
	92	08	01		92	08	31
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)	X	(3 Card Only) (46-53) QUANTITY OR LOADING (54-61)			(4 Card Only) (38-45) QUALITY OR CONCENTRATION (46-53) (54-61)				NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
1.000 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	3,671	7,500		*****	*****	*****	*****			
	PERMIT REQUIREMENT	3000 AVG	DAILY MX		*****	*****	*****	*****			
1.000 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	6.0	*****	10.6	*****			
	PERMIT REQUIREMENT	*****	*****	*****	MINIMUM	*****	MAXIMUM	*****			
1.000 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	< 0.01	---	*****			
	PERMIT REQUIREMENT	*****	*****	*****	*****	DAILY AV	DAILY MX	*****			
1.000 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.0	---	*****			
	PERMIT REQUIREMENT	*****	*****	*****	*****	DAILY AV	DAILY MX	*****			
1.000 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.103	---	*****			
	PERMIT REQUIREMENT	*****	*****	*****	*****	DAILY AV	DAILY MX	*****			
1.000 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	< 0.005	---	*****			
	PERMIT REQUIREMENT	*****	*****	*****	*****	DAILY AV	DAILY MX	*****			
1.000 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.09	---	*****			
	PERMIT REQUIREMENT	*****	*****	*****	*****	DAILY AV	DAILY MX	*****			

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)	TELEPHONE		DATE		
		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT		AREA CODE	NUMBER	YEAR

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) PRIOR TO DILUTION.  
REPORT DAILY RANGE & MEAN FOR PH.

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)  
NAME AIF DAVIDSON COMPANY

ADDRESS MAIN STREET  
WHITINSVILLE MA 01588

FACILITY  
LOCATION

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

(2-16)  
MA0001252  
PERMIT NUMBER

(17-19)  
001 A  
DISCHARGE NUMBER

2 - FINAL DILUTED  
TREATMENT PLANT EFFLUENT

Form Approved  
OMB No. 2000-0015

MONITORING PERIOD					
YEAR	MO	DAY	YEAR	MO	DAY
FROM 10	06	01	TO 02	07	31
(20-21)	(22-23)	(24-25)	(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (54-61)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
TOTAL (AS CH)	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.47	---			
	PERMIT REQUIREMENT	*****	*****	*****	*****	DAILY AV	DAILY MX			
TOTAL (AS CH)	SAMPLE MEASUREMENT	*****	*****	*****	*****	2.45	---			
	PERMIT REQUIREMENT	*****	*****	*****	*****	DAILY AV	DAILY MX			
TOTAL (AS CH)	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.610	---			
	PERMIT REQUIREMENT	*****	*****	*****	*****	DAILY AV	DAILY MX			
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

Ernest Baillargeon  
Vice-President

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)

Daniel Marques  
Facilities & Energy Mgr.

SIGNATURE OF PRINCIPAL EXECUTIVE  
OFFICER OR AUTHORIZED AGENT

TELEPHONE

617-234-7451  
AREA  
CODE NUMBER

DATE

82 9 8  
YEAR MO DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS. (Reference all attachments here).

REPORT DAILY RANGE & MEAN FOR PH.



PERMITTEE NAME/ADDRESS (include Facility Name/Location if different)

NAME **THE DAVIDSON COMPANY**

ADDRESS **MAIN STREET**

**WINTERSVILLE MA 01588**

FACILITY

LOCATION

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

(2-16)

(17-19)

MA0001252

PERMIT NUMBER

001 A

DISCHARGE NUMBER

F - FINAL LIMITS

TREATMENT PLANT EFFLUENT

*file copy*

MONITORING PERIOD					
YEAR	MO	DAY	YEAR	MO	DAY
87	07	11	87	07	31
(20-21)	(22-23)	(24-25)	(26-27)	(28-29)	(30-31)

FROM

TO

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (38-45)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
BOD	SAMPLE MEASUREMENT	0	0		*****	*****	*****			
	PERMIT REQUIREMENT	***** 30DA AVG	***** DAILY MX		*****	*****	*****			
COD	SAMPLE MEASUREMENT	*****	*****			*****				
	PERMIT REQUIREMENT	*****	*****		*****	*****	*****			
TSS	SAMPLE MEASUREMENT	*****	*****		*****					
	PERMIT REQUIREMENT	*****	*****		*****	*****	*****			
pH	SAMPLE MEASUREMENT	*****	*****		*****					
	PERMIT REQUIREMENT	*****	*****		*****	*****	*****			
NH3-N	SAMPLE MEASUREMENT	*****	*****		*****					
	PERMIT REQUIREMENT	*****	*****		*****	*****	*****			
NO3-N	SAMPLE MEASUREMENT	*****	*****		*****					
	PERMIT REQUIREMENT	*****	*****		*****	*****	*****			
NO2-N	SAMPLE MEASUREMENT	*****	*****		*****					
	PERMIT REQUIREMENT	*****	*****		*****	*****	*****			
Cu	SAMPLE MEASUREMENT	*****	*****		*****					
	PERMIT REQUIREMENT	*****	*****		*****	*****	*****			
Zn	SAMPLE MEASUREMENT	*****	*****		*****					
	PERMIT REQUIREMENT	*****	*****		*****	*****	*****			
Cd	SAMPLE MEASUREMENT	*****	*****		*****					
	PERMIT REQUIREMENT	*****	*****		*****	*****	*****			
Mn	SAMPLE MEASUREMENT	*****	*****		*****					
	PERMIT REQUIREMENT	*****	*****		*****	*****	*****			
Fe	SAMPLE MEASUREMENT	*****	*****		*****					
	PERMIT REQUIREMENT	*****	*****		*****	*****	*****			
S	SAMPLE MEASUREMENT	*****	*****		*****					
	PERMIT REQUIREMENT	*****	*****		*****	*****	*****			

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

**Ernest Baillargeon**  
**Vice-President**

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT, SEE 18 USC. § 1001 AND 33 USC. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)

**Daniel Marques**  
**Facilities & Energy Mgr.**

SIGNATURE OF PRINCIPAL EXECUTIVE  
OFFICER OR AUTHORIZED AGENT

TELEPHONE

DATE

617 234-7451 82 8 30  
AREA CODE NUMBER YEAR MO DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here):

REPORT DAILY RANGE & MEAN FOR PH.

ADDRESS MAIN STREET  
WHITINSVILLE MA 01588

12 10,  
PERMIT NUMBER

DISCHARGE NUMBER

FACILITY

LOCATION

MONITORING PERIOD						
YEAR	MO	DAY		YEAR	MO	DAY
82	07	01	TO	82	07	31
(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (54-61)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
TOTAL (AS OF) 1 0 T GROSS VOLUME	SAMPLE MEASUREMENT	*****	*****	*****	*****					
	PERMIT REQUIREMENT	*****	*****	*****	*****	DAILY AV	DAILY MAX		ONCE / MONTH	CUM
TOTAL (AS OF) 1 0 T GROSS VOLUME	SAMPLE MEASUREMENT	*****	*****	*****	*****					
	PERMIT REQUIREMENT	*****	*****	*****	*****	DAILY AV	DAILY MAX		ONCE / MONTH	CUM
TOTAL (AS OF) 1 0 T GROSS VOLUME	SAMPLE MEASUREMENT	*****	*****	*****	*****					
	PERMIT REQUIREMENT	*****	*****	*****	*****	DAILY AV	DAILY MAX		ONCE / MONTH	CUM
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT, SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)	TELEPHONE		DATE	
Ernest Baillargeon Vice-President		Daniel Marques Facilities & Energy Mgr		82 30	
TYPED OR PRINTED	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO DA

COMMENT AND EXPLANATION OF ANY VIOLATIONS. (Reference all attachments here.)  
REPORT DAILY RANGES & MEAN FOR PH.

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)  
NAME **DAVIDSON COMPANY**  
ADDRESS **MAIN STREET**  
**WHITINSVILLE MA 01588**

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)  
DISCHARGE MONITORING REPORT (DMR)

OMB No. 2000-0015

(2-16) **MA0001252**  
PERMIT NUMBER  
(17-19) **001 A**  
DISCHARGE NUMBER

**FILED LIMITS**  
**TREATMENT PLANT EFFLUENT**

FACILITY  
LOCATION  
**W. L. AKERS, PLANT METALLURGIST**

MONITORING PERIOD							
YEAR		MO		DAY			
FROM	92	06	01	TO	92	06	30
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (38-45) (46-53) (54-61)				NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
100 GALL	SAMPLE MEASUREMENT	3,664	5,400		4 + + + + +	4 + + + + +	4 + + + + +	4 + + + + +			
100 GALL	PERMIT REQUIREMENT	3000 AVG	DAILY MAX		4 + + + + +	4 + + + + +	4 + + + + +	4 + + + + +			
100 GALL	SAMPLE MEASUREMENT	4 + + + + +	4 + + + + +	4 + + + + +	3.2	4 + + + + +	10.0				
100 GALL	PERMIT REQUIREMENT	4 + + + + +	4 + + + + +	4 + + + + +	MINIMUM	4 + + + + +	MAXIMUM				
100 GALL	SAMPLE MEASUREMENT	4 + + + + +	4 + + + + +	4 + + + + +	4 + + + + +	---	< 0.01				
100 GALL	PERMIT REQUIREMENT	4 + + + + +	4 + + + + +	4 + + + + +	4 + + + + +	DAILY AV	DAILY MAX	MG/L			
100 GALL	SAMPLE MEASUREMENT	4 + + + + +	4 + + + + +	4 + + + + +	4 + + + + +	---	---				
100 GALL	PERMIT REQUIREMENT	4 + + + + +	4 + + + + +	4 + + + + +	4 + + + + +	DAILY AV	DAILY MAX	MG/L			
100 GALL	SAMPLE MEASUREMENT	4 + + + + +	4 + + + + +	4 + + + + +	4 + + + + +	---	< 0.005				
100 GALL	PERMIT REQUIREMENT	4 + + + + +	4 + + + + +	4 + + + + +	4 + + + + +	DAILY AV	DAILY MAX	MG/L			
100 GALL	SAMPLE MEASUREMENT	4 + + + + +	4 + + + + +	4 + + + + +	4 + + + + +	---	< 0.005				
100 GALL	PERMIT REQUIREMENT	4 + + + + +	4 + + + + +	4 + + + + +	4 + + + + +	DAILY AV	DAILY MAX	MG/L			
100 GALL	SAMPLE MEASUREMENT	4 + + + + +	4 + + + + +	4 + + + + +	4 + + + + +	---	< 0.05				
100 GALL	PERMIT REQUIREMENT	4 + + + + +	4 + + + + +	4 + + + + +	4 + + + + +	DAILY AV	DAILY MAX	MG/L			

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER		I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)	TELEPHONE		DATE				
Ernest Baillargeon Vice-President			Daniel Marques Facilities & Energy Mgr	617-234-7451	82	7	09		
TYPED OR PRINTED			SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT		AREA CODE	NUMBER	YEAR	MO	DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)  
REPORT DAILY RANGE & MEAN FOR PH.

## DISCHARGE MONITORING REPORT (DMR)

(2-16)

(17-19)

TREATMENT PLANT EFFLUENT

MA0001252

001 A

PERMIT NUMBER

DISCHARGE NUMBER

## MONITORING PERIOD

YEAR	MO	DAY	TO	YEAR	MO	DAY
2021	01	01	TO	2021	06	30
(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)	X	(3 Card Only) (46-53) QUANTITY OR LOADING (54-61)			(4 Card Only) (38-45) QUALITY OR CONCENTRATION (46-53) (54-61)				NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
PHOSPHORUS, TOTAL (AS CO) 1.0		*****	*****	*****	*****	---	0.24				
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT					DAILY AV	DAILY MX			ONCE / MONTH	COMPL
PHOSPHORUS, INORGANIC (AS CO) 1.0		*****	*****	*****	*****	---	1.09				
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT					DAILY AV	DAILY MX			ONCE / MONTH	COMPL
PHOSPHORUS, TOTAL (AS CO) 1.0		*****	*****	*****	*****	---	0.120				
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT					DAILY AV	DAILY MX			ONCE / MONTH	COMPL
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)	Daniel Marques Facilities & Energy Mgr.	TELEPHONE	DATE		
Ernest Baillargeon Vice-President			617-234-7451	82	7	09
TYPED OR PRINTED	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO	DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here).  
REPORT DAILY RANGE & MEAN FOR PH.

PERMITTEE NAME/ADDRESS (Include  
Facility Name/Location if different)

NAME **ATF DAVIDSON COMPANY**

ADDRESS **MAIN STREET  
WHITINSVILLE PA 01588**

FACILITY

LOCATION

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

(2-16)

(17-19)

PERMIT NUMBER **PA0001252**

DISCHARGE NUMBER **001 A**

F - FINAL LIMITS

TREATMENT PLANT EFFLUENT

Form Approved

OMB No. 2000-0015

MONITORING PERIOD

FROM	YEAR	MO	DAY	TO	YEAR	MO	DAY
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) (46-53) QUANTITY OR LOADING (54-61)			(4 Card Only) (38-45) QUALITY OR CONCENTRATION (46-53) (54-61)				NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
	SAMPLE MEASUREMENT	3,000	8,000								
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
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	PERMIT REQUIREMENT										
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	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

**Ernest Baillargeon  
Vice-President**

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)

**S. Parajon  
Fac. & Energy Mgr.**

SIGNATURE OF PRINCIPAL EXECUTIVE  
OFFICER OR AUTHORIZED AGENT

TELEPHONE

DATE

617 234-7451 82 5 2  
AREA CODE NUMBER YEAR MO DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

REPORT DAILY RANGE & MEAN FOR PH.

NAME: DAVIDSON COMPANY  
ADDRESS: MAIN STREET  
WHITINSVILLE MA 01588  
FACILITY:  
LOCATION:

DISCHARGE MONITORING REPORT (DMR)  
(2-16) MA0001252  
PERMIT NUMBER  
(17-19) 001 A  
DISCHARGE NUMBER  
MONITORING PERIOD  
FROM YEAR 82 MO 03 DAY 11 TO YEAR 82 MO 03 DAY 31  
(20-21) (22-23) (24-25) (26-27) (28-29) (30-31)

OMB No. 2000-0015  
TREATMENT PLANT EFFLUENT  
file copy  
NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (54-61)				NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
TOTAL (AS CO)	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
TOTAL (AS CO)	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
TOTAL (AS CO)	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
TOTAL (AS CO)	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
TOTAL (AS CO)	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
TOTAL (AS CO)	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
TOTAL (AS CO)	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
TOTAL (AS CO)	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
TOTAL (AS CO)	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)	Signature of Principal Executive Officer or Authorized Agent	TELEPHONE	DATE			
Ernest Baillargeon Vice President			617 234-7451	1982	6	2	
TYPED OR PRINTED			AREA CODE	NUMBER	YEAR	MO	DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)  
EPUF DAILY RANGE & MEAN FOR PH.

NAME ATF DAVIDSON COMPANY

ADDRESS MAIN STREET

1 WHITISVILLE

### FACILITY

**LOCATION**

# UNIT 6. 1. WORKS, PLANT METALLURGISTS

## DISCHARGE MONITORING REPORT (DMR)

(2-16)

(17-19)

MA0001257

001 A

PERMIT NUMBER

DISCHARGE NUMBER

**MONITORING PERIOD**

FROM			TO		
YEAR	MO	DAY	YEAR	MO	DAY
82	04	01	82	04	30
(20-21)	(22-23)	(24-25)	(26-27)	(28-29)	(30-31)

1 - FILED 1, 1941:5

TREATMENT PLANT EFFLUENT-

**NOTE: Read instructions before completing this form.**

PARAMETER (32-37)	X	(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (54-61)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
1000 1 0 PERMIT GROSS VALUE	SAMPLE MEASUREMENT	2,805	3975							
	PERMIT REQUIREMENT	3000 AVG	DAILY MX						CORRECTION	
1000 1 0 PERMIT GROSS VALUE	SAMPLE MEASUREMENT				6.0		6.9			
	PERMIT REQUIREMENT				6.0 MINIMUM		9.5 MAXIMUM		CORRECTION	
1000 1 0 PERMIT GROSS VALUE	SAMPLE MEASUREMENT						0.01			
	PERMIT REQUIREMENT						1.0 DAILY MX		CORRECTION	
1000 1 0 PERMIT GROSS VALUE	SAMPLE MEASUREMENT						Refer to Report			
	PERMIT REQUIREMENT						1.0 DAILY MX		CORRECTION	
1000 1 0 PERMIT GROSS VALUE	SAMPLE MEASUREMENT						0.005			
	PERMIT REQUIREMENT						1.0 DAILY MX		CORRECTION	
1000 1 0 PERMIT GROSS VALUE	SAMPLE MEASUREMENT						0.005			
	PERMIT REQUIREMENT						1.0 DAILY MX		CORRECTION	
1000 1 0 PERMIT GROSS VALUE	SAMPLE MEASUREMENT						0.05			
	PERMIT REQUIREMENT						1.0 DAILY MX		CORRECTION	

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

AREA CODE

TELEPHONE

DATE

COMMENT AND EXPLANATION OF ANY VIOLATIONS. (Reference all attachments here). FOR THE DIRECTOR.  
REPORT DAILY RANGE & MEAN FOR PH.

NAME **KIP DAVIDSON COMPANY**  
 ADDRESS **MAIN STREET**  
**WHITINSVILLE MA 01588**  
 FACILITY  
 LOCATION

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

(2-16)

(17-19)

MA0001257  
 PERMIT NUMBER

001 A  
 DISCHARGE NUMBER

WATER QUALITY CONTROL  
 TREATMENT PLANT EFFLUENT

OMB No. 20

APRIL - 1982

MONITORING PERIOD					
YEAR	MO	DAY	YEAR	MO	DAY
82	04	01	82	04	30
(20-21)	(22-23)	(24-25)	(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (54-61)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
BOD, 5 DAY (21-22)	SAMPLE MEASUREMENT	*****	*****	*****	*****	-----	< 0.29			
	PERMIT REQUIREMENT	*****	*****	*****	*****	DAILY AV	DAILY MX		WEEKLY	COMPO
BOD, 5 DAY (21-22)	SAMPLE MEASUREMENT	*****	*****	*****	*****	-----	< 1.67			
	PERMIT REQUIREMENT	*****	*****	*****	*****	DAILY AV	DAILY MX		WEEKLY	COMPO
TSS, TOTAL (23-24)	SAMPLE MEASUREMENT	*****	*****	*****	*****	-----	< 0.119			
	PERMIT REQUIREMENT	*****	*****	*****	*****	DAILY AV	DAILY MX		WEEKLY	COMPO
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER  E. Baillargeon Vice President	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)	TELEPHONE		DATE		
		617 234-7451		82	5	14
TYPED OR PRINTED	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO	DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here).  
 REPORT DAILY RANGE & MEAN FOR PH.



1. NAME/ADDRESS (Facility Name/Location if different)  
DAVIDSON COMPANY  
STREET  
WHITINSVILLE MA 01586  
FACILITY  
LOCATION

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

OMB No. 2000-0015

(2-16) MA0001252  
PERMIT NUMBER  
(17-19) 001 A  
DISCHARGE NUMBER

TREATMENT PLANT EFFLUENT

MONITORING PERIOD  
FROM YEAR MO DAY TO YEAR MO DAY  
(20-21) (22-23) (24-25) (26-27) (28-29) (30-31)  
1982 03 01 1982 03 31

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (54-61)				NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
1.000000	SAMPLE MEASUREMENT	3,520	5.775								
1.000000	PERMIT REQUIREMENT										
1.000000	SAMPLE MEASUREMENT				6.0		7.3				
1.000000	PERMIT REQUIREMENT						2.5	50			
1.000000	SAMPLE MEASUREMENT						0.070				
1.000000	PERMIT REQUIREMENT						1.0	MG/L			
1.000000	SAMPLE MEASUREMENT						0.070				
1.000000	PERMIT REQUIREMENT						1.0	MG/L			
1.000000	SAMPLE MEASUREMENT						0.012				
1.000000	PERMIT REQUIREMENT						2.0	MG/L			
1.000000	SAMPLE MEASUREMENT						0.005				
1.000000	PERMIT REQUIREMENT						1.0	MG/L			
1.000000	SAMPLE MEASUREMENT						0.05				
1.000000	PERMIT REQUIREMENT						1.0	MG/L			

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)	TELEPHONE		DATE		
TYPED OR PRINTED		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO

COMMENT AND EXPLANATION OF ANY VIOLATIONS: (Reference all attachments here.)  
REPORT DAILY RANGE & MEAN FOR PH.

PERMITTEE NAME, ADDRESS (if different)  
 Facility Name / Location (if different)  
**NAME** AFE DAVIDSON COMPANY

**ADDRESS** MAIN STREET  
 WHITINSVILLE PA 01586

**FACILITY**  
**LOCATION** 1.5 ACRES, PLANT METEOROLOGIST

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)  
 DISCHARGE MONITORING REPORT (DMR)

(2-16) MA0001252  
 (17-19) 001 A  
 PERMIT NUMBER DISCHARGE NUMBER

F - FINAL LIMITS  
 TREATMENT PLANT EFFLUENT

Form Approved  
 OMB No. 2000-0015

MONITORING PERIOD								
FROM			TO					
YEAR	MO	DAY	YEAR	MO	DAY			
82	03	01	82	03	31			
(20-21)	(22-23)	(24-25)	(26-27)	(28-29)	(30-31)			

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (38-43)				NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
PHLEP, TOTAL (AS CU)	SAMPLE MEASUREMENT	*****	*****	*****	*****	-----	0.29				
1 0	PERMIT REQUIREMENT	*****	*****	*****	*****			MG/L		ONCE / MONTH	COMP
PERMIT GROSS VALUE											
PHLEP, TOTAL (AS NT)	SAMPLE MEASUREMENT	*****	*****	*****	*****	-----	1.02				
1 0	PERMIT REQUIREMENT	*****	*****	*****	*****			MG/L		ONCE / MONTH	COMP
PERMIT GROSS VALUE											
PHLEP, TOTAL (AS ZN)	SAMPLE MEASUREMENT	*****	*****	*****	*****	-----	0.120				
1 0	PERMIT REQUIREMENT	*****	*****	*****	*****			MG/L		ONCE / MONTH	COMP
PERMIT GROSS VALUE											
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)	TELEPHONE		DATE			
E. Baillargeon Vice - President		D. Marques Fac. & Energy Mgr.		617	234-7451	82	4
TYPED OR PRINTED	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO	DAY	

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) FOR NO VIOLATION.  
 REPORT DAILY RANGE & MEAN FOR PH.

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)

NAME **ATF DAVIDSON COMPANY**

ADDRESS **MAIN STREET**

**WHITINSVILLE**

**MA 01588**

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

OMB No. 2000-0015

(2-16)

(17-19)

**MA0001252**

**001 A**

PERMIT NUMBER

DISCHARGE NUMBER

**T - FINAL LIMITS**

**TREATMENT PLANT EFFLUENT**

*File COPY -*

**FEBRUARY - 1982**

FACILITY

LOCATION

**ATTN: G L AKERS, PLANT METALLURGIST**

MONITORING PERIOD					
YEAR	MO	DAY	YEAR	MO	DAY
82	02	01	82	02	28
(20-21)	(22-21)	(24-25)	(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (54-61)				NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
FLOW RATE	SAMPLE MEASUREMENT	2,902	4,350	GPD	*****	*****	*****	*****			
00003 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****		*****	*****	*****	*****		CONTINUOUS	RECORD
PH	SAMPLE MEASUREMENT	*****	*****	*****	5.6	*****	7.5	SU			
00400 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****		6.0	*****	9.5			CONTINUOUS	
CYANIDE, TOTAL (AS CN)	SAMPLE MEASUREMENT	*****	*****	*****	*****	---	0.010	MG/L			
00720 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****		*****	.5	1.0			ONCE/MONTH	COMPOSE
CYANIDE, FREE (AMEN. TO CHLORINATION)	SAMPLE MEASUREMENT	*****	*****	*****	*****	---	0.0	MG/L			
00722 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****		*****	.05	.1			ONCE/MONTH	COMPOSE
CADMIUM, TOTAL (AS CD)	SAMPLE MEASUREMENT	*****	*****	*****	*****	---	0.005	MG/L			
00007 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****		*****	.2	.2			ONCE/MONTH	COMPOSE
CHROMIUM, HEXAVALENT (AS CR)	SAMPLE MEASUREMENT	*****	*****	*****	*****	---	0.005	MG/L			
01032 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****		*****	.05	.1			ONCE/MONTH	COMPOSE
CHROMIUM, TOTAL (AS CR)	SAMPLE MEASUREMENT	*****	*****	*****	*****	---	0.05	MG/L			
01034 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****		*****	.5	1.0			ONCE/MONTH	COMPOSE

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 USC § 1001 AND 33 USC § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)

TELEPHONE

DATE

TYPED OR PRINTED

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

AREA CODE

NUMBER

YEAR

MO

DAY

LIMITS APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.  
REPORT DAILY RANGE & MEAN FOR PH.

DAVIDSON COMPANY

 MAIN STREET  
WHITINSVILLE

MA 01588

## DISCHARGE MONITORING REPORT (DMR)

(2-16)

(17-19)

MA0001257

PERMIT NUMBER

001 A

DISCHARGE NUMBER

F - FINAL LIMITS

TREATMENT PLANT EFFLUENT

OMB No. 2003-0012

FACILITY

LOCATION

ITN: G L AKERS, PLANT METALLURGIST

FROM

YEAR	MO	DAY
82	02	01

(20-21) (22-23) (24-25)

TO

YEAR	MO	DAY
82	02	28

(26-27) (28-29) (30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (54-61)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
COPPER, TOTAL (AS CU) 0002 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	---	0.57			
	PERMIT REQUIREMENT	*****	*****	*****	*****	.5	1.0 MG/L		ONCE/ MONTH	COMPO
NICKEL, TOTAL (AS NI) 01087 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	---	0.93			
	PERMIT REQUIREMENT	*****	*****	*****	*****	2.0	2.0 MG/L		ONCE/ MONTH	COMPO
ZINC, TOTAL (AS ZN) 01092 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	---	0.130			
	PERMIT REQUIREMENT	*****	*****	*****	*****	.5	1.0 MG/L		ONCE/ MONTH	COMPO
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

 E. Baillargeon  
Vice-President

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 USC § 1001 AND 33 USC § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)

*D. Marques*  
Fac. & Energy Mgr.  
SIGNATURE OF PRINCIPAL EXECUTIVE  
OFFICER OR AUTHORIZED AGENT

TELEPHONE

DATE

617 234-7451

82 3 5

 AREA  
CODE

NUMBER

YEAR MO DAY

LIMITS APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.  
REPORT DAILY RANGE & MEAN FOR PH.

NAME ATF DAVIDSON COMPANY  
ADDRESS MAIN STREET  
WHITINSVILLE MA 01588

MA0001252  
PERMIT NUMBER

001 A  
DISCHARGE NUMBER

FACILITY  
LOCATION

MONITORING PERIOD  
FROM YEAR MO DAY TO YEAR MO DAY  
82 01 01 82 01 31  
(20-21) (22-24) (25-28) (29-31)

ATTN: G L AKERS, PLANT METALLURGIST

NOTE: Read instructions before completing this form

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (54-61)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM		
FLOW RATE	SAMPLE MEASUREMENT	2625	4275		*****	*****	*****		
00056 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****	GPD	*****	*****	*****		CONTINUOUS
PH	SAMPLE MEASUREMENT	*****	*****	*****	2.0	*****	10.2		
00400 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****	*****	6.0	*****	9.5	SU	CONTINUOUS
CYANIDE, TOTAL (AS CN)	SAMPLE MEASUREMENT	*****	*****	*****	*****	-----	<0.005		
00720 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****	*****	*****	.5	1.0	MG/L	ONCE/MONTH
CYANIDE, FREE (AVEN. TO CHLORINATION)	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.0	0.0		
00722 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****	*****	*****	.05	.1	MG/L	ONCE/MONTH
CADMIUM, TOTAL (AS CD)	SAMPLE MEASUREMENT	*****	*****	*****	*****	-----	0.006		
01027 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****	*****	*****	.2	.2	MG/L	ONCE/MONTH
CHROMIUM, HEXAVALENT (AS CR)	SAMPLE MEASUREMENT	*****	*****	*****	*****	-----	<0.005		
01032 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****	*****	*****	.05	.1	MG/L	ONCE/MONTH
CHROMIUM, TOTAL (AS CR)	SAMPLE MEASUREMENT	*****	*****	*****	*****	-----	<0.05		
01034 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****	*****	*****	.5	1.0	MG/L	ONCE/MONTH

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT SEE 18 USC. § 1001 AND 33 USC § 1319 (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)	TELEPHONE		D A	
		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT		AREA CODE	NUMBER

LIMITS APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.  
REPORT DAILY RANGE & MEAN FOR PH.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)  
DISCHARGE MONITORING REPORT (DMR)

Form Approved  
OMB No. 2000

NAME/ADDRESS (Include  
Name/Location if different)

NAME ATF DAVIDSON COMPANY

ADDRESS MAIN STREET

WHITINSVILLE

MA 01588

MA0001252

PERMIT NUMBER

001 A

DISCHARGE NUMBER

F - FINAL LIMITS  
TREATMENT PLANT EFFLUENT

FACILITY

LOCATION

ATTN: G L AKERS, PLANT METALLURGIST

MONITORING PERIOD						
YEAR	MO	DAY	TO	YEAR	MO	DAY
82	01	01	TO	82	01	31
(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (54-61)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SA T (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
COPPER, TOTAL (AS CU) 01042 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	---	0.52			
	PERMIT REQUIREMENT	*****	*****	*****	*****	.5	1.0	MG/L	ONCE/	CO
NICKEL, TOTAL (AS NI) 01067 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	---	1.43			
	PERMIT REQUIREMENT	*****	*****	*****	*****	2.0	2.0	MG/L	ONCE/	CO
ZINC, TOTAL (AS ZN) 01092 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	---	0.090			
	PERMIT REQUIREMENT	*****	*****	*****	*****	.5	1.0	MG/L	ONCE/	CO
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

E. Baillargeon  
Vice-President

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)

D. Marnes

SIGNATURE OF PRINCIPAL EXECUTIVE  
OFFICER OR AUTHORIZED AGENT

TELEPHONE

DATE

617 234-7451

82 2

AREA  
CODE

NUMBER

YEAR

MO

COMMENTS AND EXPLANATION OF ANY MONITORING LIMITS APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.  
REPORT DAILY RANGE & MEAN FOR PH.

PERMITTEE NAME/ADDRESS (Include  
Facility Name/Location if different)

NAME **ATF DAVIDSON COMPANY**

ADDRESS **MAIN STREET**

**WHITINSVILLE**

**MA 01588**

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

(2-18)

(17-19)

**MA0001252**

PERMIT NUMBER

**001 A**

DISCHARGE NUMBER

F - FINAL LIMITS

TREATMENT PLANT EFFLUENT

OMB No. 2000-0015

FACILITY

LOCATION

ATTN: G. L. AKERS, PLANT METALLURGIST

MONITORING PERIOD

YEAR	MO	DAY	YEAR	MO	DAY
81	12	01	81	12	31
(10-21)	(12-21)	(12-25)	(12-27)	(12-29)	(10-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (54-61)				NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
FLOW RATE	SAMPLE MEASUREMENT	2866	4425	GPD	*****	*****	*****	*****		DAILY	METER
00056 1 0	PERMIT REQUIREMENT	*****	*****		*****	*****	*****	*****		CONTINUOUS	RECORD
EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	6.0	*****	10.6				
00400 1 0	PERMIT REQUIREMENT	*****	*****	*****	6.0	*****	9.5	SU		CONTINUOUS	
EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.005					
AMIDE, TOTAL (AS CN)	PERMIT REQUIREMENT	*****	*****	*****	*****	.5	1.0	MG/L		ONCE/MONTH	COMPOS
0720 1 0	SAMPLE MEASUREMENT	*****	*****	*****	*****	N.A.	N.A.				
EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****	*****	*****	.05	.1	MG/L		ONCE/MONTH	COMPOS
AMIDE, FREE (AVEN. O CHLORINATION)	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.005	—				
0722 1 0	PERMIT REQUIREMENT	*****	*****	*****	*****	.2	.2	MG/L		ONCE/MONTH	COMPOS
EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.005	—				
ADMIUM, TOTAL (AS CR)	PERMIT REQUIREMENT	*****	*****	*****	*****	.05	.1	MG/L		ONCE/MONTH	COMPOS
1032 1 0	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.05	—				
EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****	*****	*****	.5	1.0	MG/L		ONCE/MONTH	COMPOS
CHROMIUM, HEXAVALENT (AS CR)	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.005	—				
1034 1 0	PERMIT REQUIREMENT	*****	*****	*****	*****	.5	1.0	MG/L		ONCE/MONTH	COMPOS
EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.05	—				
CHROMIUM, TOTAL (AS CR)	PERMIT REQUIREMENT	*****	*****	*****	*****	.5	1.0	MG/L		ONCE/MONTH	COMPOS

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION I BELIEVE THE SUBMITTED INFORMATION IS TRUE ACCURATE AND COMPLETE I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT SEE 18 USC § 1001 AND 33 USC § 1319 (Penalties under these statutes may include fines up to \$10,000 and of maximum imprisonment of between 6 months and 5 years.)

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE

DATE

TYPED OR PRINTED

AREA CODE

NUMBER

YEAR

MO

DAY

LIMITS APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.  
REPORT DAILY RANGE & MEAN FOR PH.

NAME/ADDRESS (Include Location if different)

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)  
DISCHARGE MONITORING REPORT (DMR)

Form Approved  
OMB No. 2000-0015

ATF DAVIDSON COMPANY

MAIN STREET

WHITINSVILLE

MA 01588

MA0001252

PERMIT NUMBER

001 A

DISCHARGE NUMBER

F - FINAL LIMITS  
TREATMENT PLANT EFFLUENT

MONITORING PERIOD

YEAR	MO	DAY	YEAR	MO	DAY
81	12	01	81	12	31
(10-11)	(12-1)	(24-15)	(12-17)	(12-19)	(10-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (54-61)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
PPER, TOTAL (AS CU)	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.17	—			
042 1 0 ELUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****	*****	*****	.5	1.0		ONCE/ MONTH	COMPOS
CKE TOTAL (AS NI)	SAMPLE MEASUREMENT	*****	*****	*****	*****	1.12	—			
067 1 0 ELUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****	*****	*****	2.0	2.0		ONCE/ MONTH	COMPOS
IC, TOTAL (AS ZN)	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.054	—			
092 1 0 ELUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****	*****	*****	.5	1.0		ONCE/ MONTH	COMPOS
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

Ernest Baillargeon  
Manufacturing, Mgr.

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT SEE 18 USC § 1001 AND 33 USC § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)

*Ernest Baillargeon*  
Ernest Baillargeon  
Facilities Mgr.  
SIGNATURE OF PRINCIPAL EXECUTIVE  
OFFICER OR AUTHORIZED AGENT

TELEPHONE

DATE

AREA  
CODE

NUMBER

YEAR

MO

DAY

TESTS APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.  
REPORT DAILY RANGE & MEAN FOR PH.



NAME DAVIDSON COMPANY  
ADDRESS MAIN STREET  
WHITINSVILLE MA 01588

DISCHARGE MONITORING REPORT (EPA)

(2-16)

(17-19)

F - FINAL LIMITS  
TREATMENT PLANT EFFLUENT

OMB No. 2000-001

MA0001257

PERMIT NUMBER

001 A

DISCHARGE NUMBER

FACILITY  
LOCATION

MONITORING PERIOD					
YEAR	MO	DAY	YEAR	MO	DAY
81	11	01	81	11	30
(20-21)	(22-23)	(24-25)	(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)	X	(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (54-61)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
FLOW RATE		2,866	4,425	GPD	*****	*****	*****	*****	0	Cont. N.A.
00056 1 0 EFFLUENT GROSS VALUE		*****	*****		*****	*****	*****	*****		CONTINUOUS
PH		*****	*****	*****	6.3	*****	7.3			
00000 1 0 EFFLUENT GROSS VALUE		*****	*****	*****	6.0	*****	9.5	SU		CONTINUOUS
CYANIDE, TOTAL (AS CN)		*****	*****	*****	*****	< 0.005	----			
00720 1 0 EFFLUENT GROSS VALUE		*****	*****	*****	*****	.5	1.0	MG/L	ONCE/MONTH	COMPOUND
CYANIDE, FREE (AMEN. TO CHLORINATION)		*****	*****	*****	*****	----	----			
00722 1 0 EFFLUENT GROSS VALUE		*****	*****	*****	*****	.05	.1	MG/L	ONCE/MONTH	COMPOUND
CADMIUM, TOTAL (AS CD)		*****	*****	*****	*****	< 0.005	----			
01027 1 0 EFFLUENT GROSS VALUE		*****	*****	*****	*****	.2	.2	MG/L	ONCE/MONTH	COMPOUND
CROMIUM, HEXAVALENT (AS CR)		*****	*****	*****	*****	< 0.005	----			
01032 1 0 EFFLUENT GROSS VALUE		*****	*****	*****	*****	.05	.1	MG/L	ONCE/MONTH	COMPOUND
CHROMIUM, TOTAL (AS CR)		*****	*****	*****	*****	< 0.05	----			
01034 1 0 EFFLUENT GROSS VALUE		*****	*****	*****	*****	.5	1.0	MG/L	ONCE/MONTH	COMPOUND

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)

Ernest Baillargeon  
Vice-President Mfg.

TYPED OR PRINTED

*Daniel Marques*  
Daniel Marques

SIGNATURE OF PRINCIPAL EXECUTIVE  
OFFICER OR AUTHORIZED AGENT

TELEPHONE

DATE

617-234-7451

81 12 8

AREA  
CODE

NUMBER

YEAR

MO

DAY

LIMITS APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.  
REPORT DAILY RANGE & MEAN FOR PH.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)  
DISCHARGE MONITORING REPORT (DMR)

Form Approved  
OMB No. 2000-0015

F - FINAL LIMITS  
TREATMENT PLANT EFFLUENT

**WATERWAY COMPANY**  
ABRAHAM STREET  
WHITINSVILLE MA 01588

MA0001257  
PERMIT NUMBER

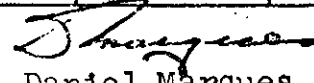
001 A  
DISCHARGE NUMBER

FACILITY  
LOCATION

MONITORING PERIOD					
YEAR	MO	DAY	YEAR	MO	DAY
81	11	01	81	11	30
(20-21)	(22-21)	(24-25)	(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)	X	(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (38-45)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
COPPER, TOTAL (AS CU) 002 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.17	----		0	Cont. N.A.
	PERMIT REQUIREMENT	*****	*****	*****	*****	.5	1.0	MG/L		ONCE/MONTH
NICKEL, TOTAL (AS NI) 01067 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	1.12	----			
	PERMIT REQUIREMENT	*****	*****	*****	*****	2.0	2.0	MG/L		ONCE/MONTH
ZINC, TOTAL (AS ZN) 01092 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.054	----			
	PERMIT REQUIREMENT	*****	*****	*****	*****	.5	1.0	MG/L		ONCE/MONTH
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)	 <b>Daniel Marques</b> SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE	DATE			
Ernest Baillargeon Vice-President Mfg.			617-234-7451	81	12	8	
TYPED OR PRINTED			AREA CODE	NUMBER	YEAR	MO	DAY

LIMITS APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.  
REPORT DAILY RANGE & MEAN FOR PH.

NAME STE DAVIDSON COMPANY

ADDRESS MAIN STREET

WHITINSVILLE

MA 01588

(2-16)

(17-19)

MA0001252

PERMIT NUMBER

001 A

DISCHARGE NUMBER

F - FINAL LIMITS

TREATMENT PLANT EFFLUENT

FACILITY

LOCATION

## MONITORING PERIOD

FROM	YEAR	MO	DAY	TO	YEAR	MO	DAY
	81	10	01		81	10	31
	(10-21)		(12-21)		(12-27)		(10-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)	SAMPLE MEASUREMENT	(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (54-61)				NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
FLOW RATE		4002	7,050	GPD	*****	*****	*****	*****			
PERMIT REQUIREMENT		*****	*****		*****	*****	*****	*****			
EFFLUENT GROSS VALUE				4002							
PERMIT REQUIREMENT		*****	*****	*****	*****	*****	*****	*****			
EFFLUENT GROSS VALUE				*****	5.6	*****	7.7				
PERMIT REQUIREMENT		*****	*****	*****	6.0	*****	9.5	SI			
EFFLUENT GROSS VALUE				*****							
CYANIDE, TOTAL (AS CN)		*****	*****	*****	*****	0.050	*****				
PERMIT REQUIREMENT		*****	*****	*****	*****	.5	1.0	MG/L			
EFFLUENT GROSS VALUE				*****							
CYANIDE, FREE (AMEN. TO CHLORINATION)		*****	*****	*****	*****	0.043	*****				
PERMIT REQUIREMENT		*****	*****	*****	*****	.05	.1	MG/L			
EFFLUENT GROSS VALUE				*****							
CADMIUM, TOTAL (AS CD)		*****	*****	*****	*****	0.062	*****				
PERMIT REQUIREMENT		*****	*****	*****	*****	.2	.2	MG/L			
EFFLUENT GROSS VALUE				*****							
CHROMIUM, HEXAVALENT (AS CR)		*****	*****	*****	*****	0.008	*****				
PERMIT REQUIREMENT		*****	*****	*****	*****	.05	.1	MG/L			
EFFLUENT GROSS VALUE				*****							
CHROMIUM, TOTAL (AS CR)		*****	*****	*****	*****	<0.05	*****				
PERMIT REQUIREMENT		*****	*****	*****	*****	.5	1.0	MG/L			
EFFLUENT GROSS VALUE				*****							

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

Ernest Baillargeon  
Manager of Manufacturing

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)

*Daniel Marques*  
Daniel Marques

SIGNATURE OF PRINCIPAL EXECUTIVE  
OFFICER OR AUTHORIZED AGENT

TELEPHONE

DATE

617  
AREA  
CODE234-3476  
NUMBER81  
YEAR11  
MO18  
DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS. (Reference all attachments here)  
LIMITS APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.  
REPORT DAILY RANGE & MEAN FOR PH.

NAME STATE DAVIDSON COMPANY

ADDRESS MAIN STREET

WHITINSVILLE

MA 01588

(2-16)

(17-19)

MA0001252

001 A

PERMIT NUMBER

DISCHARGE NUMBER

F - FIELD LIMITS

TREATMENT PLANT EFFLUENT

FACILITY

LOCATION

MONITORING PERIOD

YEAR	MO	DAY	YEAR	MO	DAY
81	10	01	81	10	31
(10-21)	(22-23)	(24-25)	(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (54-61)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
COPPER, TOTAL (AS CU) 01062 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.28	*****			
	PERMIT REQUIREMENT	*****	*****	*****	*****	.5	1.0	MG/L	ONCE/ MONTH	COMPO
NICKEL, TOTAL (AS NI) 01067 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	1.55	*****			
	PERMIT REQUIREMENT	*****	*****	*****	*****	2.0	2.0	MG/L	ONCE/ MONTH	COMPO
ZINC, TOTAL (AS ZN) 01092 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.049	*****			
	PERMIT REQUIREMENT	*****	*****	*****	*****	.5	1.0	MG/L	ONCE/ MONTH	COMPO
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

Ernest Baillargeon  
Manager of Manufacturing

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN. AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)

*Daniel Marques*  
Daniel Marques

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE

DATE

617 234-7451 81 11 18

AREA CODE

NUMBER

YEAR

MO

DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS. (Reference all attachments here.)  
LIMITS APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.  
REPORT DAILY RANGE & MEAN FOR PH.

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)

NAME ATE DAVIDSON COMPANY

ADDRESS MAIN STREET

WHITINSVILLE

MA 01582

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)  
DISCHARGE MONITORING REPORT (DMR)

(2-16)

(17-19)

MA0001252

PERMIT NUMBER

001 A

DISCHARGE NUMBER

F - FINAL LIMITS  
TREATMENT PLANT EFFLUENT

OMB No. 2000-0015

EPA

FACILITY

LOCATION

MONITORING PERIOD

YEAR	MO	DAY	YEAR	MO	DAY
81	09	01	81	09	30
(20-21)	(22-23)	(24-25)	(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (54-61)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
RATE 00056 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	5,200	7,050	GPD	*****	*****	*****	0	Cont.	N.A.
	PERMIT REQUIREMENT	*****	*****		*****	*****	*****			
00400 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	6.2	*****	7.7	50	CONTINUOUS	
	PERMIT REQUIREMENT	*****	*****		6.0	*****	9.5			
CYANIDE, TOTAL (AS CN) 00720 -1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	---	0.006			
	PERMIT REQUIREMENT	*****	*****		*****	.5	1.0			
CYANIDE, FREE (ANEN. NO CHLORINATION) 00722 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	---	---			
	PERMIT REQUIREMENT	*****	*****		*****	.05	.1			
CADIUM, TOTAL (AS CD) 01027 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	---	<0.005			
	PERMIT REQUIREMENT	*****	*****		*****	.2	.2			
CHROMIUM, HEXAVALENT (AS CR) 01032 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	---	<0.005			
	PERMIT REQUIREMENT	*****	*****		*****	.05	.1			
CHROMIUM, TOTAL (AS CR) 01034 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	---	<0.05			
	PERMIT REQUIREMENT	*****	*****		*****	.5	1.0			

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

Ernest Baillargeon  
Manager of Manufacturing

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT, SEE 18 USC. § 1001 AND 33 USC. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)

Daniel Marques

SIGNATURE OF PRINCIPAL EXECUTIVE  
OFFICER OR AUTHORIZED AGENT

TELEPHONE

617 234-3476 81 9 5

DATE

AREA  
CODE

NUMBER

YEAR

MO

DAY

APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.  
DAILY RANGE & MEAN FOR PH.

PERMITTEE NAME/ADDRESS (Include  
Facility Name/Location if different)

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

OMB No. 2000-0012

NAME **ATF DAVIDSON COMPANY**

DISCHARGE MONITORING REPORT (DMR)

F - FINAL LIMITS

TREATMENT PLANT EFFLUENT

ADDRESS **MAIN STREET**

MA0001257

001 A

**WHITINSVILLE**

MA 01588

PERMIT NUMBER

DISCHARGE NUMBER

FACILITY

LOCATION

MONITORING PERIOD

FROM	YEAR	MO	DAY	TO	YEAR	MO	DAY
	81	09	01		81	09	30
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53)			(4 Card Only) QUALITY OR CONCENTRATION (54-61)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
COPPER, TOTAL (AS CU) 42 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	---	0.29			
	PERMIT REQUIREMENT	*****	*****	*****	*****	.5	1.0	MG/L	ONCE/ MONTH	COMPL.
NICKEL, TOTAL (AS NI) 01067 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	---	0.35			
	PERMIT REQUIREMENT	*****	*****	*****	*****	2.0	2.0	MG/L	ONCE/ MONTH	COMPL.
ZINC, TOTAL (AS ZN) 01092 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	*****	*****	---	0.040			
	PERMIT REQUIREMENT	*****	*****	*****	*****	.5	1.0	MG/L	ONCE/ MONTH	COMPL.
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)

*Daniel Marques*  
**Daniel Marques**  
SIGNATURE OF PRINCIPAL EXECUTIVE  
OFFICER OR AUTHORIZED AGENT

TELEPHONE

DATE

**Ernest Baillargeon**  
**Manager of Manufacturing**

617 234-3476 81 9 5

TYPED OR PRINTED

AREA CODE NUMBER YEAR MO DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)  
LIMITS APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.  
REPORT DAILY RANGE & MEAN FOR PH.

DATE  
9/1/81

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
DISCHARGE MONITORING REPORT

Form Approved  
OMB NO. 158-R0073

Facility or discharge location

Name ATF-Davidson Co.  
Street Main St.  
City Whitinsville  
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

(12-31) ST	(14-19) MA0001252 PERMIT NUMBER	(17-19) 01 DIS
---------------	---------------------------------------	----------------------

REPORTING PERIOD: FROM

(20-21) YEAR	(22-23) MO	(24-25) DAY
-----------------	---------------	----------------

TO

(26-27) YEAR	(28-29) MO	(30-31) DAY
-----------------	---------------	----------------

PARAMETER		QUANTITY				CONCENTRATION				FREQUENCY OF ANALYSIS	SAMPLE TYPE
		MINIMUM	AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS		
Total Cyanide	REPORTED						0.006			1-31	8 Hr. Comp
	PERMIT CONDITION										
Cyanide Amenable to Chlorination	REPORTED						-----			"	"
	PERMIT CONDITION										
Total Suspended Solids	REPORTED						2.6			"	"
	PERMIT CONDITION										
Total Chromium	REPORTED						0.05			"	"
	PERMIT CONDITION										
Hexavalent Chromium	REPORTED						0.005			"	"
	PERMIT CONDITION										
Cadmium	REPORTED						0.005			"	"
	PERMIT CONDITION										
Copper	REPORTED						0.29			"	"
	PERMIT CONDITION										
Nickel	REPORTED						0.35			"	"
	PERMIT CONDITION										

NAME OF PRINCIPAL EXECUTIVE OFFICER		TITLE OF THE OFFICER		DATE		I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT
LAST	FIRST	MI	TITLE	YEAR	MO		
Baillargeon	Ernest		Manager of Mfg.	8	1	1021	

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
DISCHARGE MONITORING REPORT

Form Approved  
OMB NO. 155-R0073

Facility or discharge location

Name ATF-Davidson Co.  
Street Main St.  
City Whitinsville  
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

(12-13)  
ST


(14-16)  
MA0001252  
PERMIT NUMBER

(17-19)  
01  
DIS

REPORTING PERIOD: FROM  
(20-21) (22-23) (24-25)  
YEAR MO DAY

TO  
(26-27) (28-29) (30-31)  
81 81 9  
YEAR MO DAY

PARAMETER		(3 card only)				UNITS	NO. EX	(4 card only)				UNITS	NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		QUANTITY			CONCENTRATION										
		(38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM			(38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM						
Zinc	REPORTED							0.040					1-31	8 Hr. Comp.	
	PERMIT CONDITION														
	REPORTED														
	PERMIT CONDITION														
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	PERMIT CONDITION														
	REPORTED														
	PERMIT CONDITION														

NAME OF PRINCIPAL EXECUTIVE OFFICER			TITLE OF THE OFFICER			DATE			I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.	 SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT
LAST	FIRST	MI	TITLE			YEAR	MO	DAY		
Baillargeon	Ernest		Manager of Mfg.			81	11	02		



NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
DISCHARGE MONITORING REPORT

Form Approved  
OMB NO. 158-R0073

Facility or discharge location

Name ATF-Davidson Co.  
Street Main St.  
City Whitinsville  
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

(12-31) ST	(14-16) MA0001252 PERMIT NUMBER	(17-19) 01 DIS
REPORTING PERIOD FROM		
(20-21) YEAR	(22-23) MO	(24-25) DAY

TO		
(26-27) YEAR	(28-29) MO	(30-31) DAY

PARAMETER		(3 card only) QUANTITY				NO. EX	(4 card only) CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		MINIMUM	AVERAGE	MAXIMUM	UNITS		MINIMUM	AVERAGE	MAXIMUM	UNITS			
Total Cyanide	REPORTED							0.010				1-31	8 Hr. Comp.
	PERMIT CONDITION												
Cyanide Amenable to Chlorination	REPORTED							-----				"	"
	PERMIT CONDITION												
Total Suspended Solids	REPORTED							1.3				"	"
	PERMIT CONDITION												
Total Chromium	REPORTED							0.05				"	"
	PERMIT CONDITION												
Hexavalent Chromium	REPORTED							0.008				"	"
	PERMIT CONDITION												
Cadmium	REPORTED							0.005				"	"
	PERMIT CONDITION												
Copper	REPORTED							0.21				"	"
	PERMIT CONDITION												
Nickel	REPORTED							0.64				"	"
	PERMIT CONDITION												

NAME OF PRINCIPAL EXECUTIVE OFFICER		TITLE OF THE OFFICER		DATE		I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT
Baillargeon, Ernest		Manager of Mfg.		81 1 021			
LAST	FIRST	MI	TITLE	YEAR	MO	DAY	

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
DISCHARGE MONITORING REPORT

Form Approved  
OMB NO. 158-R0073

Facility or discharge location

Name ATF-Davidson Co.  
Street Main St.  
City Whitinsville  
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code)

(617) 234-7451

(12-3)  
ST

(4-16)  
MA0001252  
PERMIT NUMBER

(17-19)  
01  
DIS

REPORTING PERIOD FROM

(20-21) (22-23) (24-25)  
YEAR MO DAY

TO

(26-27) (28-29) (30-31)  
81 17 21  
YEAR MO DAY

PARAMETER		(3 card only) QUANTITY				UNITS	NO. EX	(4 card only) CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		MINIMUM	AVERAGE	MAXIMUM	MINIMUM			AVERAGE	MAXIMUM					
Zinc	REPORTED							0.060				1-31	8 Hr. Comp.	
	PERMIT CONDITION													
	REPORTED													
	PERMIT CONDITION													
	REPORTED													
	PERMIT CONDITION													
	REPORTED													
	PERMIT CONDITION													
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	PERMIT CONDITION													
	REPORTED													
	PERMIT CONDITION													
	REPORTED													
	PERMIT CONDITION													
	REPORTED													
	PERMIT CONDITION													
NAME OF PRINCIPAL EXECUTIVE OFFICER		TITLE OF THE OFFICER			DATE		I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.					SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT		
Baillargeon, Ernest		Manager of Mfg.			81 10 21									
LAST FIRST MI		TITLE			YEAR MO DAY									

Facility or discharge location

DISCHARGE MONITORING REPORT

Form A,  
OMB NO. 1

Name ATF-Davidson Co.  
Street Main St.  
City Whitinsville  
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

(12-31) (14-16) (17-19)  
ST MA 001252  
PERMIT NUMBER

01  
DIS

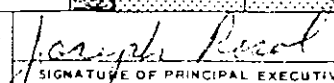
REPORTING PERIOD: FROM

(20-21) (22-23) (24-25)  
YEAR MO DAY

TO

(26-27) (28-29) (30-31)  
8 1 16 24  
YEAR MO DAY

PARAMETER		(3 card only)				(4 card only)				FREQUENCY OF ANALYSIS	SAMPLE TYPE	
		QUANTITY			UNITS	CONCENTRATION						
		MINIMUM	AVERAGE	MAXIMUM		NO. EX	MINIMUM	AVERAGE	MAXIMUM	UNITS	NO. EX	
Total Cyanide	REPORTED						0.062				1-30	8-Hr. Comp.
	PERMIT CONDITION											
Cyanide Amenable to Chlorination	REPORTED						0.046				"	"
	PERMIT CONDITION											
Total Suspended Solids	REPORTED						1.3				"	"
	PERMIT CONDITION											
Total Chromium	REPORTED						0.05				"	"
	PERMIT CONDITION											
Hexavalent Chromium	REPORTED						0.005				"	"
	PERMIT CONDITION											
Cadmium	REPORTED						0.008				"	"
	PERMIT CONDITION											
Copper	REPORTED						0.28				"	"
	PERMIT CONDITION											
Nickel	REPORTED						0.67				"	"
	PERMIT CONDITION											

NAME OF PRINCIPAL EXECUTIVE OFFICER			TITLE OF THE OFFICER			DATE			I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.	 SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT
Baillargeon, Ernest			Manager of Mfg.			8 1 7 2 0				
LAST	FIRST	MI	TITLE	YEAR	MO	DAY				

## Facility or discharge location

## DISCHARGE MONITORING REPORT

OMB

Name ATF-Davidson Co.  
Street Main St.  
City Whitinsville  
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

(12-13) ST	(14-16) MA 001252 PERMIT NUMBER	(17-19) 01 DIS
REPORTING PERIOD FROM		
(20-21) YEAR	(22-23) MO	(24-25) DAY

TO

(26-27) YEAR	(28-29) MO	(30-31) DAY
81	6	24

PARAMETER		QUANTITY				NO EX	CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		MINIMUM	AVERAGE	MAXIMUM	UNITS		MINIMUM	AVERAGE	MAXIMUM	UNITS			
Zinc	REPORTED							0.040				1-30	8 Hr. Comp.
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
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	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												

NAME OF PRINCIPAL EXECUTIVE OFFICER			TITLE OF THE OFFICER		DATE	
Baillargeon, Ernest			Manager of Mfg.		81 7 20	
LAST	FIRST	MI	TITLE		YEAR	MO DAY

I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.

*Joseph R. Rood*  
SIGNATURE OF PRINCIPAL EXECUTIVE  
OFFICER OR AUTHORIZED AGENT

Facility or discharge location

DISCHARGE MONITORING REPORT

Name ATF-Davidson Co.  
Street Main St.  
City Whitinsville  
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

(12-3) ST	(14-18) MA 001252 PERMIT NUMBER	(17-19) 01 DIS
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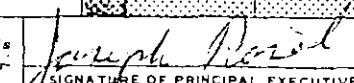
REPORTING PERIOD FROM

(20-21) YEAR	(22-23) MO	(24-25) DAY
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TO

(26-27) YEAR	(28-29) MO	(30-31) DAY
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PARAMETER		(3 card only) QUANTITY				UNITS	NO. EX	(4 card only) CONCENTRATION			UNITS	NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		(32-43) MINIMUM	(44-53) AVERAGE	(54-61) MAXIMUM	(62-63) MINIMUM			(64-73) AVERAGE	(74-81) MAXIMUM					
Total Cyanide	REPORTED							0.010					1-31	8 Hr. Comp.
	PERMIT CONDITION													
Cyanide Amenable to Chlorination	REPORTED							-----					"	"
	PERMIT CONDITION													
Total Suspended Solids	REPORTED							1.4					"	"
	PERMIT CONDITION													
Total Chromium	REPORTED							0.05					"	"
	PERMIT CONDITION													
Hexavalent Chromium	REPORTED							0.005					"	"
	PERMIT CONDITION													
Cadmium	REPORTED							0.005					"	"
	PERMIT CONDITION													
Copper	REPORTED							0.20					"	"
	PERMIT CONDITION													
Nickel	REPORTED							1.02					"	"
	PERMIT CONDITION													

NAME OF PRINCIPAL EXECUTIVE OFFICER			TITLE OF THE OFFICER		DATE		I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.	 SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT
LAST	FIRST	MI	TITLE		YEAR	MO		
Baillargeon	Ernest		Manager of Mfg.		8	1	72	0

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
DISCHARGE MONITORING REPORT

Facility or discharge location

Name ATF-Davidson Co.  
Street Main St.  
City Whitinsville  
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

(12-3) ST	(14-16) MA 001252 PERMIT NUMBER	(17-19) 01 DIS
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REPORTING PERIOD FROM

(20-21) YEAR	(22-23) MO	(24-25) DAY
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TO

(26-27) YEAR	(28-29) MO	(30-31) DAY
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PARAMETER		(3 card only) QUANTITY				UNITS	NO. EX	(4 card only) CONCENTRATION				UNITS	NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		(32-37) MINIMUM	(38-45) AVERAGE	(46-53) MAXIMUM	(54-61)			(62-63) MINIMUM	(64-69) AVERAGE	(70-77) MAXIMUM	(78-85)				
Zinc	REPORTED								0.05					1-31	8-Hr. Comp.
	PERMIT CONDITION														
	REPORTED														
	PERMIT CONDITION														
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	REPORTED														
	PERMIT CONDITION														
	REPORTED														
	PERMIT CONDITION														

NAME OF PRINCIPAL EXECUTIVE OFFICER			TITLE OF THE OFFICER			DATE		
Baillargeon, Ernest			Manager of Mfg.			81 7 20		
LAST	FIRST	MI	TITLE	YEAR	MO	DAY		

I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.

*Joseph Rosol*  
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
DISCHARGE MONITORING REPORT

Facility or discharge location

Name ATF-Davidson Co.  
Street Main St.  
City Whitinsville  
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

(2-3) ST	(4-16) MA 001252 PERMIT NUMBER	(17-19) 01 DIS
REPORTING PERIOD: FROM		
(20-21) YEAR	(22-23) MO	(24-25) DAY

TO

(26-27) YEAR	(28-29) MO	(30-31) DAY
81	42	22

PARAMETER		(3 card only) QUANTITY					(4 card only) CONCENTRATION					FREQUENCY OF ANALYSIS	SAMPLE TYPE
		MINIMUM	AVERAGE	MAXIMUM	UNITS	NO. EX	MINIMUM	AVERAGE	MAXIMUM	UNITS	NO. EX		
Total Cyanide	REPORTED							0.005				1-30	8 Hr. Comp.
	PERMIT CONDITION												
Cyanide Amenable to Chlorination	REPORTED							-----				"	"
	PERMIT CONDITION												
Total Suspended Solids	REPORTED							0.5				"	"
	PERMIT CONDITION												
Total Chromium	REPORTED							0.05				"	"
	PERMIT CONDITION												
Hexavalent Chromium	REPORTED							0.01				"	"
	PERMIT CONDITION												
Cadmium	REPORTED							0.005				"	"
	PERMIT CONDITION												
Copper	REPORTED							0.09				"	"
	PERMIT CONDITION												
Nickel	REPORTED							0.17				"	"
	PERMIT CONDITION												
NAME OF PRINCIPAL EXECUTIVE OFFICER		TITLE OF THE OFFICER		DATE		I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.							
Baillargeon, Ernest		Manager of Mfg.		81 7 20									
LAST	FIRST	MI	TITLE	YEAR	MO	DAY	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT						

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
DISCHARGE MONITORING REPORT

Facility or discharge location

Name ATF-Davidson Co.  
Street Main St.  
City Whitinsville  
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

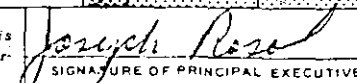
(12-13) ST	(14-16) MA 001252 PERMIT NUMBER	(17-19) 01 DIS
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REPORTING PERIOD FROM

(20-21) YEAR	(22-23) MO	(24-25) DAY

TO

(26-27) YEAR	(28-29) MO	(30-31) DAY
81	4	22

PARAMETER		(3 card only) QUANTITY				UNITS	(4 card only) CONCENTRATION				UNITS	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		MINIMUM	AVERAGE	MAXIMUM	NO. EX		MINIMUM	AVERAGE	MAXIMUM				
Zinc	REPORTED							0.04				1-30	8 Hr. Comp.
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
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	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
NAME OF PRINCIPAL EXECUTIVE OFFICER		TITLE OF THE OFFICER		DATE		I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.		 SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT					
Baillargeon, Ernest		Manager of Mfg.		81 7 20									
LAST	FIRST	MI	TITLE	YEAR	MO	DAY							



NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
DISCHARGE MONITORING REPORT

Form Approved  
OMB NO. 158-R0071

Facility or discharge location

Name ATF-Davidson Co.  
Street Main St.  
City Whitinsville  
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

(12-2) ST	(14-16) MA 001252 PERMIT NUMBER	(17-19) 01 DIS
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REPORTING PERIOD FROM

(20-21) YEAR	(22-23) MO	(24-25) DAY
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TO

(26-27) YEAR	(28-29) MO	(30-31) DAY
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PARAMETER		(3 card only) QUANTITY				UNITS	NO. EX	(6 card only) CONCENTRATION			UNITS	NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		(32-33) MINIMUM	(34-35) AVERAGE	(36-37) MAXIMUM	(38-39) MINIMUM			(40-41) AVERAGE	(42-43) MAXIMUM					
Total Cyanide	REPORTED							0.010					1-31	8 Hr. Comp.
	PERMIT CONDITION													
Cyanide Amenable to Chlorination	REPORTED							0					"	"
	PERMIT CONDITION													
Total Suspended Solids	REPORTED							1.3					"	"
	PERMIT CONDITION													
Total Chromium	REPORTED							0.05					"	"
	PERMIT CONDITION													
Hexavalent Chromium	REPORTED							0.005					"	"
	PERMIT CONDITION													
Cadmium	REPORTED							0.006					"	"
	PERMIT CONDITION													
Copper	REPORTED							0.13					"	"
	PERMIT CONDITION													
Nickel	REPORTED							0.35					"	"
	PERMIT CONDITION													
NAME OF PRINCIPAL EXECUTIVE OFFICER		TITLE OF THE OFFICER				DATE		I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.						
Ballargeon, Ernest		Manager of Mfg.				8 1 4 2								
LAST FIRST MI		TITLE				YEAR MO DAY		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT						

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
DISCHARGE MONITORING REPORT

Form Approved  
OMB NO. 158-R0073

Facility or discharge location

Name ATF-Davidson Co.  
Street Main St.  
City Whitinsville  
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

(18-21) ST	(4-16) MA 001252 PERMIT NUMBER	(17-19) 01 DIS
REPORTING PERIOD FROM		
(20-21) YEAR	(22-23) MO	(24-25) DAY

TO		
(26-27) YEAR	(28-29) MO	(30-31) DAY

PARAMETER		(3 card only) QUANTITY				NO EX	(4 card only) CONCENTRATION				UNITS	NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		MINIMUM	AVERAGE	MAXIMUM	UNITS		MINIMUM	AVERAGE	MAXIMUM	UNITS				
Zinc	REPORTED							0.05					1-31	8 Hr. Comp.
	PERMIT CONDITION													
	REPORTED													
	PERMIT CONDITION													
	REPORTED													
	PERMIT CONDITION													
	REPORTED													
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	REPORTED													
	PERMIT CONDITION													
	REPORTED													
	PERMIT CONDITION													
	REPORTED													
	PERMIT CONDITION													
	REPORTED													
	PERMIT CONDITION													

NAME OF PRINCIPAL EXECUTIVE OFFICER		TITLE OF THE OFFICER		DATE		I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT
LAST	FIRST	TITLE	YEAR	MO	DAY		
Baillargeon	Ernest	Manager of Mfg.	81	4	2		<i>Joseph R. ...</i>

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
DISCHARGE MONITORING REPORT

Form Approved  
OMB NO. 158-R0073

Facility or discharge location

Name ATF-Davidson Co.  
Street Main St.  
City Whitinsville  
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

(2-3) ST	(4-16) MA 001252 PERMIT NUMBER	(17-19) 01 DIS
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REPORTING PERIOD: FROM			TO		
(20-21) YEAR	(22-23) MO	(24-25) DAY	(26-27) YEAR	(28-29) MO	(30-31) DAY
			81	2	21

PARAMETER		(3 card only) QUANTITY				(4 card only) CONCENTRATION					FREQUENCY OF ANALYSIS	SAMPLE TYPE
		(38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	(62-63) UNITS	(64-65) NO. EX	(66-73) MINIMUM	(74-81) AVERAGE	(82-89) MAXIMUM	(90-91) UNITS		
Total Cyanide	REPORTED						0.024				1-28	8 Hr. Comp.
	PERMIT CONDITION											
Cyanide Amenable to Chlorination	REPORTED						0.014				"	"
	PERMIT CONDITION											
Total Suspended Solids	REPORTED						1.8				"	"
	PERMIT CONDITION											
Total Chromium	REPORTED						0.05				"	"
	PERMIT CONDITION											
Hexavalent Chromium	REPORTED						0.005				"	"
	PERMIT CONDITION											
Cadmium	REPORTED						0.005				"	"
	PERMIT CONDITION											
Copper	REPORTED						0.17				"	"
	PERMIT CONDITION											
Nickel	REPORTED						0.35				"	"
	PERMIT CONDITION											

NAME OF PRINCIPAL EXECUTIVE OFFICER		TITLE OF THE OFFICER		DATE		I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT
LAST	FIRST	MI	TITLE	YEAR	MO		
Baillargeon	Ernest		Manager of Mfg.	81	4	2	<i>Joseph Powell</i>

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
DISCHARGE MONITORING REPORT

Form Approved  
OMB NO. 158-R0073

Facility or discharge location

Name ATF-Davidson Co.  
Street Main St.  
City Whitinsville,  
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

(12-3)  
ST

(14-16)  
MA 001252  
PERMIT NUMBER

(17-19)  
01  
DIS

REPORTING PERIOD: FROM  
(20-21) (22-23) (24-25)  
YEAR MO DAY

TO  
(26-27) (28-29) (30-31)  
81 12 24  
YEAR MO DAY

PARAMETER		(3 card only) QUANTITY				(4 card only) CONCENTRATION				FREQUENCY OF ANALYSIS	SAMPLE TYPE
		MINIMUM	AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS		
Zinc	REPORTED						0.04			1-28	8 Hr. Comp.
	PERMIT CONDITION										
	REPORTED										
	PERMIT CONDITION										
	REPORTED										
	PERMIT CONDITION										
	REPORTED										
	PERMIT CONDITION										
	REPORTED										
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	REPORTED										
	PERMIT CONDITION										
	REPORTED										
	PERMIT CONDITION										

NAME OF PRINCIPAL EXECUTIVE OFFICER  
Baillargeon, Ernest  
LAST FIRST MI

TITLE OF THE OFFICER  
Manager of Mfg.  
TITLE

DATE  
81 14 1  
YEAR MO DAY

I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT  
*Joseph P. Rinaldi*

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
DISCHARGE MONITORING REPORT

Form Approved  
OMB NO. 158-R0073

Facility or discharge location

Name ATF-Davidson Co.  
Street Main St.  
City Whitinsville  
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

(2-3) ST	(4-10) MA 001252 PERMIT NUMBER	(17-19) 01 DIS
-------------	--------------------------------------	----------------------

(20-21) YEAR	(22-23) MO	(24-25) DAY
8	1	1

(26-27) YEAR	(28-29) MO	(30-31) DAY
8	1	2

PARAMETER		(3 card only) QUANTITY				(4 card only) CONCENTRATION				FREQUENCY OF ANALYSIS	SAMPLE TYPE
		MINIMUM	AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS		
Total Cyanide	REPORTED						0.009			1-31	8 Hr. Comp.
	PERMIT CONDITION										
Cyanide Amenable to Chlorination	REPORTED						0.007			"	"
	PERMIT CONDITION										
Total Suspended Solids	REPORTED						2.0			"	"
	PERMIT CONDITION										
Total Chromium ✓	REPORTED						0.05			"	"
	PERMIT CONDITION										
Hexavalent Chromium	REPORTED						0.005			"	"
	PERMIT CONDITION										
Cadmium ✓	REPORTED						0.010			"	"
	PERMIT CONDITION										
Copper ✓	REPORTED						0.17			"	"
	PERMIT CONDITION										
Nickel ✓	REPORTED						1.29			"	"
	PERMIT CONDITION										

NAME OF PRINCIPAL EXECUTIVE OFFICER		TITLE OF THE OFFICER		DATE	
Baillargeon, Ernest		Manager of Mfg.		8 1 4 2	
LAST	FIRST	MI	TITLE	YEAR	MO DAY

I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.

*Joseph R. Rana*  
SIGNATURE OF PRINCIPAL EXECUTIVE  
OFFICER OR AUTHORIZED AGENT

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
DISCHARGE MONITORING REPORT

Form Approved  
OMB NO. 158-R0073

Facility or discharge location

Name ATF-Davidson Co.  
Street Main St.  
City Whitinsville  
State/Zip code Mass. 01588

see IN

Remark

Telephone number (including area code) (617) 234-7451

(2-3) ST	(4-16) MA 001252 PERMIT NUMBER	(17-19) 01 DIS
-------------	--------------------------------------	----------------------

REPORTING PERIOD FROM			TO		
(20-21) YEAR	(22-23) MO	(24-25) DAY	(26-27) YEAR	(28-29) MO	(30-31) DAY
			8	1	2

*Kovich - is buying a piece of the property \$ is disputing the acreage He has threatened to call us & report the CERCLA notification which he knows about will receive reply by 3/15*

PARAMETER		QUANTITY				(4 card only)		CC
		(3 card only) (38-45) MINIMUM	(40-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(38-45) MINIMUM	
Zinc	REPORTED							0.
	PERMIT CONDITION							
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	PERMIT CONDITION							

NAME OF PRINCIPAL EXECUTIVE OFFICER		TITLE OF THE OFFICER		DATE	
Baillargeon, Ernest		Manager of Mfg.		8 1 4 2	
LAST	FIRST	MI	TITLE	YEAR	MO DAY

I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.

*Joseph Rosol*  
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

SCANNED

**Corey  
Management  
Company, Inc.**

Date: 11/04/02

To: MARK MATYS  
DEP CRD

Fax #: 508-792-7621

From: DON COREY

Message:

ATF DAVIDSON - NORTHBRIDGE

RTN 2-0111

PER YOUR REQUEST, ATTACHED ARE BWSC-104 &

BWSC-111 FIRST SHEETS, SHOWING CORRECT STREET

NUMBER (355 MAIN). THE TRANSMITTALS HAD

BEEN PREPARED TO AGREE WITH DEP'S DATA BASE

(SEE NOAF DATED 01/23/02) EVEN THOUGH IT  
HAD WRONG STREET NUMBER.

3 Pages Including This Cover

The documents accompanying this telecopy transmission contain confidential, privileged or proprietary information that either constitutes the property of Corey Management Company, Inc., or if the property of another represents information that is within Corey Management's care, custody and control. The information is intended for the use of the individual or entity named on the transmission sheet. If you are not the intended recipient, be aware that any disclosure, copying or use of this telecopied information is prohibited. If you received this telecopy in error, please notify us so that we may arrange for retrieval of the documents at no cost to you. Thank you.

**Golder Associates Inc.**

540 North Commercial Street, Suite 250  
Manchester, NH 03101-1146  
Telephone (603) 668-0880  
Fax (603) 668-1199



November 26, 2002

Our Ref.: 023-6969

Massachusetts Department of  
Environmental Protection  
Central Regional Office  
Bureau of Waste Site Cleanup  
627 Main Street  
Worcester, MA 01608

RECEIVED  
NOV 27 2002  
DEP - CERD

Attention: Mr. Greg Root

**RE: RETRACTION OF RESPONSE ACTION OUTCOME**  
**THE SHOP AT WHITINSVILLE** 1 Main St  
**RTN 2-00112** (Northbridge)

Dear Mr. Root:

On behalf of Electrolux Home Products Inc. (Electrolux), Golder Associates Inc. (Golder) is submitting this Notice of Remedial Action Outcome (RAO) retraction of the above-referenced site. Specifically, Electrolux is retracting the Class A-3 RAO filed by Blasland, Bouck & Lee, Inc. (BB&L) in October 1997 for the Building 9-Raceway area of the property. This RAO retraction notification is being submitted in response to the Notice of Noncompliance dated April 29, 2002 (NON-CE-02-3017) and your Audit Follow-up Plan Response letter dated December 2, 2002

As an attachment to this letter we have included a copy of the Tier II Extension BWSC-107A Form submitted by BB&L as part of the August 1, 2002 NON Follow-up Plan.

Should you have any questions regarding this letter please do not hesitate to call me at (603) 668-0880 or Ms. Gail Helfrick of Quantum Management Group at (609) 259-4091.

Sincerely,

**GOLDER ASSOCIATES INC.**

Alistair P. T. Macdonald, CPG, LSP  
Branch Manager and Principal

Cc: M. Baldi - MADEP  
D. Mix - Electrolux  
G. Helfrick - Quantum

APTm/cak





**TIER CLASSIFICATION, TIER II EXTENSION &  
TIER II TRANSFER TRANSMITTAL FORM**

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

Release Tracking Number

2 - 112

**A. DISPOSAL SITE LOCATION:**

Disposal Site Name: The Shop (Covitch Property)

Street: 1 Main Street

Location Aid: \_\_\_\_\_

City/Town: Whitinsville (Northbridge)

ZIP Code: 01588-0000

Related Release Tracking Numbers That This Submittal Will Address: \_\_\_\_\_

**B. THIS FORM IS BEING USED TO:** (check all that apply)

- ☐ Submit a new or revised Tier Classification Submittal for a Tier I Site, including a Numerical Ranking Scoresheet (complete Sections A, B, C, I, J, K and L).
- ☐ Submit a new or revised Tier Classification Submittal for a Tier II Site, including a Numerical Ranking Scoresheet (complete Sections A, B, C, F, G, I, J, K and L).
- ☐ Submit a Notice that an additional Release Tracking Number(s) is (are) being linked to this Tier Classified Site and rescoring is not required at this time (complete Sections A, B, J, K and L). If this submittal is for a Tier I Site, you must also submit a Minor Permit Modification Transmittal Form (BWSC-109).

List Additional Release Tracking Number(s): \_\_\_\_\_

- ☐ Submit a Phase I Completion Statement supporting a Tier Classification Submittal (complete Sections A, B, I, J, K and L).
- ☒ Submit a Tier II Extension Submittal for Response Actions at a Tier II Site (complete Sections A, B, D, F, G, I, J, K and L).
- ☐ Submit a Tier II Extension Submittal for Response Actions taken after expiration of a Waiver, pursuant to 310 CMR 40.0630(4) (complete Sections A, B, D, F, J, K and L, and also complete Sections G and I or Section H).\*
- ☐ Submit a Tier II Transfer Submittal for a change in person(s) undertaking Response Actions at a Tier II Site (complete Sections A, B, E, F, G, I, J, K, L, M, N and O).
- ☐ Submit a Tier II Transfer Submittal for a change in person(s) undertaking Response Actions at a Waiver Site, pursuant to 310 CMR 40.0630(6) (complete Sections A, B, E, F, J, K, L, M, N and O, and also complete Sections G and I or Section H).\*

You must attach all supporting documentation required for each use of form indicated,  
including copies of any Legal Notices and Notices to Public Officials required by 310 CMR 40.1400.

\*NOTE: The Waiver expires on the effective date of this submittal and all further Response Actions must be taken as a Tier II Site.

**C. TIER CLASSIFICATION SUBMITTAL:**

Numerical Ranking Score for Disposal Site: (from Numerical Ranking Scoresheet) \_\_\_\_\_

Proposed Tier Classification of Disposal Site: (check one) ☐ Tier IA ☐ Tier IB ☐ Tier IC ☒ Tier II

Check which, if any, of the Tier I inclusionary criteria are met by the Disposal Site, pursuant to 310 CMR 40.0520:

- ☐ Groundwater is located within an Interim Wellhead Protection Area or a Zone II, and there is evidence of groundwater contamination by an Oil or Hazardous Material at the time of Tier Classification at concentrations equal to or exceeding the applicable RCGW-1 Reportable Concentration set forth in 310 CMR 40.0360.
- ☐ An Imminent Hazard is present at the time of Tier Classification.
- ☐ Check here if this Tier Classification revises a previous submittal for this Disposal Site. You must include a revised Numerical Ranking Scoresheet with this submittal. If a Tier I Permit has been issued, you may also need to submit a Major Permit Modification Application (BWSC 10).

If incorporating additional Release(s) into the Disposal Site, list Release Tracking Number(s): \_\_\_\_\_

**D. TIER II EXTENSION SUBMITTAL**

State the expiration date of the Tier II Classification or Waiver for the Disposal Site, whichever is applicable: \_\_\_\_\_

Attach a statement summarizing why a Permanent or Temporary Solution has not been achieved at the Disposal Site.  
A Tier II Extension is effective for a period of one year beyond the current expiration date of the Tier II Classification or Waiver.

**E. TIER II TRANSFER SUBMITTAL REQUIREMENTS:**

State the proposed effective date of the change in person(s) undertaking Response Actions at the Disposal Site: \_\_\_\_\_

Attach a statement summarizing the reasons for the proposed change in person(s) undertaking the Response Actions.  
All Response Actions must be completed by the deadline applicable to the person who first filed either a Tier Classification Submittal for the Disposal Site or received a Waiver of Approvals.



**TIER CLASSIFICATION, TIER II EXTENSION &  
TIER II TRANSFER TRANSMITTAL FORM**

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

Release Tracking Number

2 - 112

**F. DISPOSAL SITE COMPLIANCE HISTORY SUMMARY:**

- > If providing either a Tier Classification Submittal for a Tier II Site or a Tier II Extension Submittal for a Waiver Site, the person named in Section J must provide a Compliance History.
- > If providing a Tier II Extension Submittal for a Tier II Site, the person named in Section J must update their Compliance History since the effective date of the Tier II Classification.
- > If providing a Tier II Transfer Submittal for a Tier II or Waiver Site, the person named in Section M must provide a Compliance History.

Compliance History for (provide only one name per History): See NON Follow-Up & Tier II Extension Report

☐ Check here if there has been no change to the Compliance History of the person named above (Extension Submittal for a Tier II Site ONLY).

List all permits or licenses that have been issued by the Department that are relevant to this Disposal Site:

PROGRAM:	PERMIT NUMBER:	PERMIT CATEGORY:	FACILITY ID:
Air Quality			
Hazardous Waste (M.G.L. c. 21C)			
Solid Waste			
Industrial Wastewater Management			
Water Supply			
Water Pollution Control/Surface Water			
Water Pollution Control/Groundwater			
Water Pollution Control/Sewer Connection			
Wetland & Waterways			

List all other Federal, state or local permits, licenses, certifications, registrations, variances, or approvals that are relevant to this Disposal Site:

ISSUING AUTHORITY OR PROGRAM, OR DOCUMENTATION TYPE:	IDENTIFICATION NUMBER:	DATE ISSUED:

If needed, attach to this Transmittal Form a statement further describing the Compliance History of this Disposal Site. This statement must describe the compliance history of the person named above with the following:

- (1) DEP regulations; and
- (2) other laws for the protection of health, safety, public welfare and the environment administered or enforced by any other government agency.

Such a statement should identify information such as:

- (1) actions relevant to the Disposal Site taken by the Department to enforce its requirements including, but not limited to, a Notice of Noncompliance (NON), Notice of Intent to Assess Civil Administrative Penalty (PAN), Notice of Intent to Take Response Action (NORA), and an administrative enforcement order;
- (2) administrative consent orders;
- (3) judicial consent judgements;
- (4) similar administrative actions taken by other Federal, state or local agencies;
- (5) civil or criminal actions relevant to the Disposal Site brought on behalf of the DEP or other Federal, state, or local agencies; and
- (6) any additional relevant information.

- (1) name of the issuing authority, type of action, identification number and date issued;
- (2) description of noncompliance cited;
- (3) current status of the matter; and
- (4) final disposition, if any.

RECEIVED

NOV 27 2002

DEP - CERO



**TIER CLASSIFICATION, TIER II EXTENSION &  
TIER II TRANSFER TRANSMITTAL FORM**

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

Release Tracking Number

2 - 112

**G. CERTIFICATION OF ABILITY AND WILLINGNESS:**

> If providing either a Tier II Classification Submittal or a Tier II Extension Submittal, the person who signs this certification **MUST** be the person named in Section J, or that person's agent.

> If providing a Tier II Transfer Submittal, the person who signs this certification **MUST** be the person named in Section M, or that person's agent.

I attest under the pains and penalties of perjury that (i) I/the person(s) or entity(ies) on whose behalf this submittal is made has/have personally examined and am/is familiar with the requirements of M.G.L. c. 21E and 310 CMR 40.0000; (ii) based upon my inquiry of the/those Licensed Site Professional(s) employed or engaged to render Professional Services for the disposal site which is the subject of this Transmittal Form and of the person(s) or entity(ies) on whose behalf this submittal is made, and my/those person(s)'s or entity(ies)'s understanding as to the estimated costs of necessary response actions, that/those person(s) or entity(ies) has/have the technical, financial and legal ability to proceed with response actions for such site in accordance with M.G.L. c. 21E, 310 CMR 40.0000 and other applicable requirements; and (iii) that I am fully authorized to make this attestation on behalf of the person(s) or entity(ies) legally responsible for this submittal. I/the person(s) or entity(ies) on whose behalf this submittal is made is aware of the requirements in 310 CMR 40.0172 for notifying the Department in the event that I/the person(s) or entity(ies) on whose behalf this submittal is made learn(s) that it/they is/are unable to proceed with the necessary response actions.

By: \_\_\_\_\_ Title: Property Manager  
(signature)

For: The Shop at Whitinsville  
(print name of person or entity recorded in Section J or M, as appropriate)

Date: Aug 5, 2002

If you are submitting either a Tier II Extension Submittal for a Waiver Site or a Tier II Transfer Submittal for a Waiver Site, you may choose to sign the alternative Ability and Willingness Certification found in Section H in place of providing the certification in Section G and the LSP Opinion in Section I.

**H. ALTERNATIVE CERTIFICATION OF ABILITY AND WILLINGNESS:**

- > If providing a Tier II Extension Submittal for a Waiver Site, the person who signs this certification **MUST** be the person named in Section J, or that person's agent
- > If providing a Tier II Transfer Submittal for a Waiver Site, the person who signs this certification **MUST** be the person named in Section M, or that person's agent.

I attest under the pains and penalties of perjury that (i) I/the person(s) or entity(ies) on whose behalf this submittal is made has/have personally examined and am/is familiar with the requirements of M.G.L. c. 21E and 310 CMR 40.0000; (ii) based upon my inquiry of the Consultant-of-Record for the disposal site which is the subject of this Transmittal Form and of the person(s) or entity(ies) on whose behalf this submittal is made, and my/those person(s)'s or entity(ies)'s understanding as to the estimated costs of necessary response actions, that/those person(s) or entity(ies) has/have the technical, financial and legal ability to proceed with response actions for such site in accordance with M.G.L. c. 21E, 310 CMR 40.0000 and other applicable requirements; and (iii) that I am fully authorized to make this attestation on behalf of the person(s) or entity(ies) legally responsible for this submittal. I/the person(s) or entity(ies) on whose behalf this submittal is made is aware of the requirements in 310 CMR 40.0172 for notifying the Department in the event that I/the person(s) or entity(ies) on whose behalf this submittal is made learn(s) that it/they is/are unable to proceed with the necessary response actions.

NOV 27 2002

By: \_\_\_\_\_ Title: \_\_\_\_\_  
(signature)

For: \_\_\_\_\_  
(print name of person or entity recorded in Section J or M, as appropriate)

Date: \_\_\_\_\_

**I. LSP OPINION:**

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and (iii) the provisions of 309 CMR 4.03(5), to the best of my knowledge, information and belief,

> if Section B of this form indicates that a Tier I or Tier II Classification Submittal which relies upon a previously submitted Phase I Completion Statement is being submitted, this Tier Classification Submittal has been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000;

> if Section B of this form indicates that a Phase I Completion Statement or a Tier I or Tier II Classification Submittal which does not rely upon a previously submitted Phase I Completion Statement is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

SECTION I IS CONTINUED ON THE NEXT PAGE



**TIER CLASSIFICATION, TIER II EXTENSION &  
TIER II TRANSFER TRANSMITTAL FORM**

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

Release Tracking Number

2 - 112

**I. LSP OPINION: (continued)**

> if Section B of this form indicates that a **Tier II Extension Submittal** or a **Tier II Transfer Submittal** is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

☐ Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you **MUST** attach a statement identifying the applicable provisions thereof.

LSP Name: Caron S. Koll LSP #: 6889 Stamp:

Telephone: 315-446-2570 Ext.: 148

FAX: (optional) 315-446-8053

Signature: *Caron S. Koll*

Date: 8/1/02



**J. PERSON MAKING SUBMITTAL: (For Transfer Submittals describe person currently undertaking response actions, not transferee)**

Name of Organization: The Shop at Whitinsville

Name of Contact: Leonard S. Jolles Title: Property Manager

Street: One Main Street

City/Town: Whitinsville State: MA ZIP Code: 01588-0000

Telephone: 508-234-6301 Ext.: \_\_\_\_\_ FAX: (optional) \_\_\_\_\_

**K. RELATIONSHIP TO DISPOSAL SITE OF PERSON MAKING SUBMITTAL: (check one)**

☒ RP or PRP Specify: ☒ Owner ☐ Operator ☐ Generator ☐ Transporter Other RP or PRP: \_\_\_\_\_

☐ Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)

☐ Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))

☐ Any Other Person Making Submittal Specify Relationship: \_\_\_\_\_

**L. CERTIFICATION OF PERSON MAKING SUBMITTAL:**

I, Leonard S. Jolles, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

By: *Leonard Jolles* Title: Property Manager  
(signature)

For: Leonard Jolles Date: Aug 5 2002  
(print name of person or entity recorded in Section J)

Enter address of the person providing certification(s), including Ability and Willingness Certification where applicable, if different from address recorded in Section J:

Street: \_\_\_\_\_

City/Town: \_\_\_\_\_ State: \_\_\_\_\_ ZIP Code: NOV 27 2002

Telephone: \_\_\_\_\_ Ext.: \_\_\_\_\_ FAX: (optional) \_\_\_\_\_

**YOU MUST COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE, AND YOU MAY INCUR ADDITIONAL COMPLIANCE FEES.**